

# Exhibit I

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

GWG Holdings, Inc., *et al.*,<sup>1</sup>

Debtors.

) Chapter 11

) Case No. 22-90032 (MI)

) (Jointly Administered)

**THIRD INTERIM AND FINAL FEE APPLICATION OF PAUL HASTINGS LLP,  
COUNSEL TO SEAN CLEMENTS AND THE CONFLICTS COMMITTEE OF THE  
BOARD OF DIRECTORS OF GWG DLP FUNDING IV, LLC, FOR ALLOWANCE AND  
PAYMENT OF FEES AND EXPENSES FOR THE PERIOD FROM MAY 1, 2023  
THROUGH JUNE 19, 2023**

<b>Name of Applicant:</b>	Paul Hastings LLP	
<b>Applicant's Role in Case:</b>	Attorneys to Sean Clements and the Conflicts Committee of the board of directors of GWG DLP Funding IV, LLC ("DLP IV")	
<b>Docket No. of Employment Order(s):</b>	Docket No. 1325	
<b>Interim Application (X) No. 3</b> <b>Final Application (X)</b>	Interim and Final  Prior interim applications filed at Docket Nos. 1616 and 2033.	
	<b>Beginning Date</b>	<b>End Date</b>
<b>Time period covered by this Application for which interim compensation has not previously been awarded:</b>	05/01/23	06/19/23
<b>Were the services provided necessary to the administration of or beneficial at the time rendered toward the completion of the case? Yes</b>		
<b>Were the services performed in a reasonable amount of time commensurate with the complexity, importance and nature of the issues addressed? Yes</b>		

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: GWG Holdings, Inc. (2607); GWG Life, LLC (6955); GWG Life USA, LLC (5538), GWG DLP Funding IV, LLC (2589); GWG DLP Funding VI, LLC (6955); and GWG DLP Funding Holdings VI, LLC (6955). The location of Debtor GWG Holdings, Inc.'s principal place of business and the Debtors' service address is 325 N. St. Paul Street, Suite 2650 Dallas, TX 75201. Further information regarding the Debtors and these chapter 11 cases is available at the website of the Debtors' claims and noticing agent: <https://donlinrecano.com/gwg>.

<b>Is the requested compensation reasonable based on the customary compensation charged by comparably skilled practitioners in other non-bankruptcy cases? Yes</b>	
<b>Do expense reimbursements represent actual and necessary expenses incurred? Yes</b>	
<b>Compensation Breakdown for Time Period Covered by this Application</b>	
<b>Total professional fees requested in this Application:</b>	\$139,366.00
<b>Total professional hours covered by this Application:</b>	100.30
<b>Average hourly rate for professionals:</b>	\$1,389
<b>Total paraprofessional fees requested in this Application:</b>	\$8,100.00
<b>Total paraprofessional hours covered by this Application:</b>	15.00
<b>Average hourly rate for paraprofessionals:</b>	\$540
<b>Total fees requested in this Application:</b>	\$147,466.00
<b>Total expense reimbursements requested in this Application:</b>	\$3,577.20
<b>Total fees and expenses requested in this Application:</b>	\$151,043.20
<b>Total fees and expenses awarded in all prior Applications:</b>	\$820,594.70
<p><b>Plan Status:</b> On June 20, 2023, the Court entered the <i>Order (I) Confirming the Debtors' Further Modified Second Amended Joint Chapter 11 Plan, Submitted By the Debtors, the Bondholder Committee, and L Bond Management, LLC as Co-Proponents, and (II) Granting Related Relief</i> [Docket No. 1952]. The Effective Date of the Plan was on August 1, 2023 [Docket No. 2079].</p>	
<p><b>Primary Benefits:</b> During the Interim Period, Paul Hastings diligently and effectively represented the Conflicts Committee of DLP IV and Sean Clements in his capacity as a member of the Conflicts Committee, with respect to their fiduciary duties in connection with the chapter 11 cases and investigating certain prepetition transactions.</p> <p>Specifically, Paul Hastings negotiated with the Debtors and other case parties, and advised the Conflicts Committee with respect to the Plan and related Disclosure Statement, and issues related to the releases and exculpation provisions contained therein.</p>	

Pursuant to sections 330 and 331 of Title 11 of the United States Code, Rule 2016 of the Federal Rules of Bankruptcy Procedure, Rule 2016-1 of the Bankruptcy Local Rules of the United States Bankruptcy Court for the Southern District of Texas, the Procedures for Complex Cases in the Southern District of Texas, and the Court's *Corrected Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Docket No. 378], Paul

Hastings LLP (“Paul Hastings”), counsel to the Conflicts Committee of the DLP IV Board and Sean Clements as a member of the Conflicts Committee in the above-captioned chapter 11 cases, hereby requests (a) allowance and payment of \$147,466.00 for reimbursement of actual and necessary expenses and for legal services rendered during the period from May 1, 2023 through and including June 19, 2023 (the “Interim Period”), which amounts have not been the subject of a previous fee application, and (b) final allowance and payment of the sums of \$962,435.50 as compensation and \$9,202.40 for reimbursement of actual and necessary expenses, for a total of \$971,637.90 for legal services rendered during the period from October 31, 2022 through and including June 19, 2023 (the “Final Period”). In support of its request, Paul Hastings submits the following attached exhibits:

- Exhibit A contains the monthly statements for the Interim Period, which include an itemized list of expenses incurred during the Interim Period;
- Exhibit B contains the monthly statements for the Final Period, which include an itemized list of expenses incurred during the Final Period; and
- Exhibit C contains the Proposed Order.

### **RESERVATION OF RIGHTS**

1. To the extent that time or disbursement charges for services rendered or disbursements incurred relate to the Interim Period, but were not processed before the preparation of this Application, or Paul Hastings has for any other reason not sought compensation or reimbursement with respect to such services or expenses, Paul Hastings reserves the right to request additional compensation for such services, and reimbursement of such expenses, in a supplemental or future application. Paul Hastings does not waive, and expressly reserves, its right to respond to any objections regarding this Application and the amounts sought for Paul Hastings’ work in the chapter 11 cases.

Dated: August 21, 2023  
Houston, Texas

Respectfully submitted,

/s/ James T. Grogan III

**PAUL HASTINGS LLP**

James T. Grogan III (TX Bar No. 24027354)  
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Houston, Texas 77002  
Telephone: (713) 860-7300  
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-and-

Jayne T. Goldstein (admitted *pro hac vice*)  
Daniel A. Fliman (admitted *pro hac vice*)  
Allison Miller (admitted *pro hac vice*)  
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*Counsel to the Conflicts Committee of the DLP IV Board  
and Sean Clements, Independent Director of the DLP IV  
Board*

**EXHIBIT A**

**MONTHLY STATEMENTS FOR INTERIM PERIOD**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:	)	
	)	Chapter 11
	)	
GWG Holdings, Inc., <i>et al.</i> , <sup>1</sup>	)	Case No. 22-90032 (MI)
	)	
Debtors.	)	(Jointly Administered)
	)	

**NOTICE OF SEVENTH MONTHLY FEE STATEMENT OF PAUL HASTINGS LLP,  
COUNSEL TO SEAN CLEMENTS AND THE CONFLICTS COMMITTEE OF THE  
BOARD OF DIRECTORS OF GWG DLP FUNDING IV, LLC FOR THE PERIOD  
FROM MAY 1, 2023 THROUGH MAY 31, 2023**

Name of applicant:	Paul Hastings LLP	
Applicant’s Role in the Case:	Attorneys to Sean Clements and the Conflicts Committee of the board of directors of GWG DLP Funding IV, LLC (“ <u>DLP IV</u> ”)	
Date Order of Employment Signed and Docket No.:	January 6, 2023 (effective as of October 31, 2022) [Docket No. 1325]	
	Beginning Date	End Date
Time period covered by this Statement:	05/01/2023	05/31/2023
Summary of Total Fees and Expenses Requested		
Total fees requested in this Statement:	\$57,089.60 (80% of \$71,362.00)	
Total expenses requested in this Statement:	\$1,614.84	
Total fees and expenses requested in this Statement (excluding 20% holdback):	\$72,976.84	
Total fees and expenses requested in this Statement (including 20% holdback):	\$58,704.44	
Summary of Attorney Fees Requested		
Total attorney fees requested in this Statement:	\$65,746.00	

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: GWG Holdings, Inc. (2607); GWG Life, LLC (6955); GWG Life USA, LLC (5538), GWG DLP Funding IV, LLC (2589); GWG DLP Funding VI, LLC (6955); and GWG DLP Funding Holdings VI, LLC (6955). The location of Debtor GWG Holdings, Inc.'s principal place of business and the Debtors' service address is 325 N. St. Paul Street, Suite 2650 Dallas, TX 75201. Further information regarding the Debtors and these chapter 11 cases is available at the website of the Debtors' claims and noticing agent: <https://donlinrecano.com/gwg>.

Total actual attorney hours covered by this Statement:	44.00
Average hourly rate for attorneys:	\$1,494
Summary of Paraprofessional Fees Requested	
Total paraprofessional fees requested in this Statement:	\$5,616.00
Total actual paraprofessional hours covered by this Statement:	10.40
Average hourly rate for paraprofessionals:	\$540

In accordance with the *Corrected Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and (II) Granting Related Relief* [Docket No. 378] (the “Interim Compensation Order”),<sup>2</sup> Paul Hastings LLP (“Paul Hastings”) respectfully submits this seventh monthly statement (the “Monthly Statement”) and requests payment for services rendered and reimbursement of expenses incurred as counsel to Sean Clements and the Conflicts Committee of the board of directors of DLP IV in the above-captioned chapter 11 cases for the period from May 1, 2023 through and including May 31, 2023 (the “Fee Period”) in the amounts set forth above.

### **SERVICES RENDERED AND EXPENSES INCURRED**

1. Attached hereto as **Exhibit A** is a timekeeper summary that includes the name, title, department, bar admission, hourly billing rate, aggregate hours, and amount of fees earned for each Paul Hastings individual who provided services during the Fee Period.

2. Attached hereto as **Exhibit B** is a summary of Paul Hastings’ services rendered and compensation sought, by project category, for the Fee Period.

3. Attached hereto as **Exhibit C** is a summary of expenses incurred and reimbursement sought, by expense type, for the Fee Period.

4. Attached hereto as **Exhibit D** are the fee statements of Paul Hastings for services provided during the Fee Period.

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Interim Compensation Order.



### **NOTICE AND OBJECTION PROCEDURES**

1. Notice of this Monthly Statement will be given to the following parties (collectively, the “Application Recipients”): (i) the Debtors c/o GWG Holdings, Inc., 325 N. St. Paul St., Suite 2650, Dallas, TX 75201, Attn: Timothy Evans; (ii) counsel to the Debtors, Mayer Brown LLP, 71 S. Wacker Drive, Chicago, IL 60606, Attn: Thomas S. Kiriakos; (iii) co-counsel to the Debtors, Jackson Walker LLP, 1401 McKinney Street, Suite 1900, Houston, TX 77010, Attn: Kristhy M. Peguero and Matthew D. Cavanaugh; (iv) counsel to the DIP Lender, Sidley Austin LLP, One South Dearborn, Chicago, IL 60603, Attn: Matthew A. Clemente; (v) counsel to Bank of Utah in its capacity as indenture trustee for the Bonds, Akin Gump Strauss Hauer & Feld LLP, 2001 K Street NW, Washington, D.C., 20006-1037, Attn: Scott Alberino; (vi) counsel to any statutory committee appointed in these cases; and (vii) the Office of the U.S. Trustee for the Southern District of Texas, 515 Rusk Street, Suite 3516, Houston, TX 77002, Attn: Hector Duran.

2. Objections to this Monthly Statement, if any, must be served upon the Application Recipients and the undersigned counsel by or before 4:00 p.m. (CT) on the fourteenth day after service of this Monthly Statement (the “Objection Deadline”), setting forth with specificity the objectionable fees or expenses, the amount of the disputed fees or expenses, and the basis for such objection. If no objections are received by the Objection Deadline, the Debtors shall promptly pay Paul Hastings 80 percent of the fees and 100 percent of the expenses identified in this Monthly Statement.

3. To the extent that an objection to this Monthly Statement is received on or before the Objection Deadline, the Debtors shall withhold payment of that portion of this Monthly Statement to which the objection is directed and promptly pay the remainder of the fees and expenses in the percentages set forth above. To the extent such objection is not resolved,

pursuant to the procedures set forth in the Interim Compensation Order, the objecting party shall file its objection with the Court and serve the objection on the Application Recipients and the undersigned counsel. Thereafter, Paul Hastings may either (a) file with the Court a response to the objection together with a request for payment of the appropriate portion of the disputed amount or (b) preserve and schedule the disputed amount for consideration at the next interim or final fee application hearing.

4. To the extent that time or disbursement charges for services rendered or disbursements incurred relate to the Fee Period, but were not processed before the preparation of this Monthly Statement, or Paul Hastings has for any other reason not sought compensation or reimbursement with respect to such services or expenses, Paul Hastings reserves the right to request additional compensation for such services, and reimbursement of such expenses, in a supplemental or future statement.

*[Remainder of page intentionally left blank]*

Dated: August 16, 2023  
Houston, Texas

Respectfully submitted,

/s/ James T. Grogan III

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**PAUL HASTINGS LLP**

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Telephone: (713) 860-7300  
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-and-

Jayme T. Goldstein (admitted *pro hac vice*)  
Daniel A Fliman (admitted *pro hac vice*)  
Allison Miller (admitted *pro hac vice*)  
Jeremy D. Evans (admitted *pro hac vice*)  
John F. Iaffaldano (admitted *pro hac vice*)  
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*Counsel to Sean Clements and the Conflicts Committee of  
the board of directors of DLP IV*

**Exhibit A**

**COMPENSATION BY PROFESSIONAL AND PARAPROFESSIONAL FOR FEE PERIOD**

				Total for Fee Period	
Name	Department or Group	Date of First Admission	Hourly Rate	Hours Billed	Amount
Fliman, Dan	Corporate	2003	\$1,725.00	2.70	\$4,657.50
Goldstein, Jayme	Corporate	2003	\$1,875.00	4.60	\$8,625.00
Grogan, James	Corporate	2000	\$1,700.00	16.30	\$27,710.00
Miller, Allison	Corporate	2004	\$1,725.00	1.70	\$2,932.50
<b>Total Partner:</b>				<b>25.30</b>	<b>\$43,925.00</b>
Evans, Jeremy	Corporate	2013	\$1,600.00	2.90	\$4,640.00
<b>Total Counsel:</b>				<b>2.90</b>	<b>\$4,640.00</b>
Iaffaldano, Jack	Corporate	2020	\$1,125.00	13.60	\$15,300.00
Thomas, Schlea	Corporate	2022	\$855.00	2.20	\$1,881.00
<b>Total Associate:</b>				<b>15.80</b>	<b>\$17,181.00</b>
Laskowski, Mat	Paralegal		\$540.00	9.30	\$5,022.00
Magzamen, Michel	Paralegal		\$540.00	1.10	\$594.00
<b>Total Paraprofessional:</b>				<b>10.40</b>	<b>\$5,616.00</b>
<b>Total:</b>				<b>54.40</b>	<b>\$71,362.00</b>

**Exhibit B**

**COMPENSATION BY PROJECT CATEGORY FOR FEE PERIOD**

		Total for Fee Period	
U.S. Trustee Task Code and Project Category		Total Hours	Total Fees
B110	Case Administration	5.80	\$9,026.00
B113	Pleadings Review	18.70	\$22,159.00
B155	Court Hearings	4.10	\$5,618.50
B160	Employment / Fee Applications (Paul Hastings)	8.90	\$10,941.00
B260	Board of Directors Matters	3.20	\$4,755.00
B320	Plan and Disclosure Statement	13.70	\$18,862.50
<b>TOTAL</b>		<b>54.40</b>	<b>\$71,362.00</b>

**Exhibit C**

**EXPENSE SUMMARY FOR FEE PERIOD**

Category	Total for Fee Period
Airfare	\$577.80
Lodging	\$589.94
Taxi/Ground Transportation	\$407.10
Meals	\$40.00
<b>TOTAL</b>	<b>\$1,614.84</b>

**Exhibit D**

**FEE STATEMENTS FOR FEE PERIOD**



**PAUL HASTINGS LLP**  
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Conflicts Committee of GWG DLP Funding IV, LLC  
Suite 1200  
220 South Sixth Street  
Minneapolis, MN 55402

July 28, 2023

Please Refer to  
Invoice Number: 2366570

Attn: Sean Clements

PH LLP Tax ID No. 95-2209675

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## SUMMARY SHEET

### Bankruptcy Case

PH LLP Client/Matter # 51132-00002  
Jayme Goldstein

Legal fees for professional services for the period ending May 31, 2023	\$71,362.00
Costs incurred and advanced	1,614.84
<b>Current Fees and Costs Due</b>	<b>\$72,976.84</b>
<b>Total Balance Due - Due Upon Receipt</b>	<b>\$72,976.84</b>

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

***TO PROTECT AGAINST FRAUD***, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Teri Goffredo @ 213-683-5045 or via email @ [terigoffredo@paulhastings.com](mailto:terigoffredo@paulhastings.com) and requesting written and verbal confirmation.

### Wiring and ACH Instructions:

Citibank  
ABA # 322271724  
SWIFT Address: CITIUS33  
787 W. 5th Street  
Los Angeles, CA 90071  
Account Number: 206628380  
Account Name: Paul Hastings LLP

### Remittance Address:

Paul Hastings LLP  
Lockbox 4803  
PO Box 894803  
Los Angeles, CA 90189-4803

For wires, please reference the invoice, client and matter number(s) being paid  
For ACH payments, please use the CTX format and/or send any remittances to [cashepn@paulhastings.com](mailto:cashepn@paulhastings.com). This is a no-reply mailbox  
Please refer all questions to [billing@paulhastings.com](mailto:billing@paulhastings.com)





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Suite 1200  
220 South Sixth Street  
Minneapolis, MN 55402

July 28, 2023

Please Refer to  
Invoice Number: 2366570

Attn: Sean Clements

PH LLP Tax ID No. 95-2209675

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### REMITTANCE COPY

#### **Bankruptcy Case**

PH LLP Client/Matter # 51132-00002  
Jayme Goldstein

Legal fees for professional services  
for the period ending May 31, 2023

\$71,362.00

Costs incurred and advanced

1,614.84

**Current Fees and Costs Due**

**\$72,976.84**

**Total Balance Due - Due Upon Receipt**

**\$72,976.84**

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We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

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#### **Wiring and ACH Instructions:**

Citibank  
ABA # 322271724  
SWIFT Address: CITIUS33  
787 W. 5th Street  
Los Angeles, CA 90071  
Account Number: 206628380  
Account Name: Paul Hastings LLP

#### **Remittance Address:**

Paul Hastings LLP  
Lockbox 4803  
PO Box 894803  
Los Angeles, CA 90189-4803

For wires, please reference the invoice, client and matter number(s) being paid

For ACH payments, please use the CTX format and/or send any remittances to [cashepn@paulhastings.com](mailto:cashepn@paulhastings.com). This is a no-reply mailbox

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Conflicts Committee of GWG DLP Funding IV, LLC July 28, 2023  
Suite 1200

220 South Sixth Street  
Minneapolis, MN 55402

Please Refer to  
Invoice Number: 2366570

Attn: Sean Clements

PH LLP Tax ID No. 95-2209675

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FOR PROFESSIONAL SERVICES RENDERED  
for the period ending May 31, 2023

**Bankruptcy Case** **\$71,362.00**

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>B110 Case Administration</b>					
05/01/2023	ML30	Update case calendars (.2); update distribution lists for case notice and pleadings (.2); correspond with J. Iaffaldano re hearing needs (.1).	0.50	540.00	270.00
05/01/2023	MM57	Correspond with J. Iaffaldano re: case calendar	0.20	540.00	108.00
05/03/2023	JTG4	Emails with M. Laskowski re case updates	0.20	1,700.00	340.00
05/04/2023	JTG4	Emails with M. Laskowski re case updates	0.20	1,700.00	340.00
05/04/2023	ML30	Update case calendars	0.10	540.00	54.00
05/05/2023	JTG4	Emails with M. Laskowski re case updates	0.20	1,700.00	340.00
05/08/2023	JTG4	Emails with M. Laskowski re case updates	0.10	1,700.00	170.00
05/09/2023	JTG4	Emails with M. Laskowski re case updates	0.20	1,700.00	340.00
05/11/2023	JTG4	Emails with M. Laskowski re case updates	0.20	1,700.00	340.00
05/12/2023	JTG4	Emails with M. Laskowski re case updates	0.20	1,700.00	340.00
05/15/2023	JTG4	Emails with M. Laskowski re case updates	0.20	1,700.00	340.00
05/16/2023	JTG4	Emails with M. Laskowski re case updates	0.20	1,700.00	340.00
05/17/2023	JTG4	Emails with M. Laskowski re case updates	0.20	1,700.00	340.00

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2366570

Page 2

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/17/2023	ML30	Correspond with J. Iaffaldano re 5.18.23 hearing needs	0.10	540.00	54.00
05/18/2023	JTG4	Emails with M. Laskowski re case updates	0.20	1,700.00	340.00
05/18/2023	JG32	Review and prepare notes re case updates and going forward plan (.6); telephone conference with client to discuss same (.6)	1.20	1,875.00	2,250.00
05/19/2023	JTG4	Emails with M. Laskowski re case updates	0.20	1,700.00	340.00
05/22/2023	JTG4	Emails with M. Laskowski re case updates	0.20	1,700.00	340.00
05/23/2023	JTG4	Emails with M. Laskowski re case updates	0.20	1,700.00	340.00
05/24/2023	JTG4	Emails with M. Laskowski re case updates	0.20	1,700.00	340.00
05/25/2023	JTG4	Emails with M. Laskowski re case updates	0.20	1,700.00	340.00
05/26/2023	JTG4	Emails with M. Laskowski re case updates	0.20	1,700.00	340.00
05/30/2023	JTG4	Emails with M. Laskowski re case updates	0.20	1,700.00	340.00
05/31/2023	JTG4	Emails with M. Laskowski re case updates	0.20	1,700.00	340.00
<b>Subtotal: B110 Case Administration</b>			<b>5.80</b>		<b>9,026.00</b>

**B113 Pleadings Review**

05/01/2023	AM50	Review recent court filings regarding exclusivity (.3); review updates from J. Evans regarding same (.2)	0.50	1,725.00	862.50
05/01/2023	JTG4	Review ECF notices	0.30	1,700.00	510.00
05/01/2023	ML30	Review recent filings and update working group re same	0.40	540.00	216.00
05/02/2023	JTG4	Review ECF notices	0.30	1,700.00	510.00
05/02/2023	ML30	Review recent filings and update working group re same	0.40	540.00	216.00
05/03/2023	JTG4	Review ECF notices	0.20	1,700.00	340.00
05/03/2023	ML30	Review recent filings and update working group re same	0.20	540.00	108.00
05/04/2023	JTG4	Review ECF notices	0.20	1,700.00	340.00
05/04/2023	ML30	Review recent filings and update working group re same	0.40	540.00	216.00

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2366570

Page 3

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/05/2023	JTG4	Review ECF notices	0.20	1,700.00	340.00
05/05/2023	ML30	Review recent filings and update working group re same	0.20	540.00	108.00
05/08/2023	JTG4	Review recent filings	0.20	1,700.00	340.00
05/08/2023	ML30	Review recent filings and update working group re same	0.20	540.00	108.00
05/09/2023	JTG4	Review ECF notices	0.20	1,700.00	340.00
05/09/2023	ML30	Review recent filings and update working group re same	0.20	540.00	108.00
05/10/2023	ML30	Review recent filings and update working group re same	0.20	540.00	108.00
05/11/2023	JTG4	Review ECF notices	0.20	1,700.00	340.00
05/11/2023	ML30	Review recent filings and update working group re same	0.20	540.00	108.00
05/12/2023	JTG4	Review ECF notices	0.20	1,700.00	340.00
05/12/2023	ML30	Review recent filings and update working group re same	0.20	540.00	108.00
05/15/2023	JTG4	Review ECF notices	0.40	1,700.00	680.00
05/15/2023	ML30	Review recent filings and update working group re same	0.20	540.00	108.00
05/16/2023	JTG4	Review ECF notices (.2); review Beneficient motion (.3)	0.50	1,700.00	850.00
05/16/2023	ML30	Review recent filings and update case calendars and working group re same	0.60	540.00	324.00
05/17/2023	JTG4	Review ECF notices and related pleadings	0.40	1,700.00	680.00
05/17/2023	ML30	Review recent filings and update working group re same	0.50	540.00	270.00
05/18/2023	JTG4	Review ECF notices (.2); review complaint against Fifth Season (.4)	0.60	1,700.00	1,020.00
05/18/2023	JG32	Review recently filed pleadings	0.70	1,875.00	1,312.50
05/18/2023	ML30	Review recent filings and update case calendars and working group re same	0.40	540.00	216.00
05/19/2023	JTG4	Review ECF notices	0.20	1,700.00	340.00
05/19/2023	ML30	Review recent filings and update working group re same	0.30	540.00	162.00

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2366570

Page 4

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/22/2023	JTG4	Review ECF notices (.2); review Heppner / Ben Rule 2004 motion (.4)	0.60	1,700.00	1,020.00
05/22/2023	ML30	Review recent filings and update working group re same	0.50	540.00	270.00
05/23/2023	JTG4	Review ECF notices (.2); review new docket entries and related documents (.3)	0.50	1,700.00	850.00
05/23/2023	ML30	Review recent filings and update working group re same	0.60	540.00	324.00
05/24/2023	JTG4	Review ECF notices (.2); review exit credit agreement pleadings (.6)	0.80	1,700.00	1,360.00
05/24/2023	ML30	Review recent filings and update case calendars and working group re same	0.60	540.00	324.00
05/25/2023	JTG4	Review ECF notices and related pleadings	0.50	1,700.00	850.00
05/25/2023	ML30	Review recent filings and update case calendars and working group re same	1.00	540.00	540.00
05/26/2023	JTG4	Review ECF notices (.2); review L Bond Management emergency motion (.3)	0.50	1,700.00	850.00
05/26/2023	ML30	Review recent filings and update working group re same	0.40	540.00	216.00
05/30/2023	JTG4	Review ECF notices (.2); review Fifth Season motion (.3)	0.50	1,700.00	850.00
05/30/2023	ML30	Review recent filings and update working group re same	0.40	540.00	216.00
05/31/2023	JTG4	Review ECF notices	0.20	1,700.00	340.00
05/31/2023	JG32	Review recently filed pleadings regarding open case issues and next steps	1.20	1,875.00	2,250.00
05/31/2023	ML30	Review recent filings and update working group and case calendars re same	0.50	540.00	270.00
<b>Subtotal: B113 Pleadings Review</b>			<b>18.70</b>		<b>22,159.00</b>

**B155 Court Hearings**

05/01/2023	J12	Monitor hearing on Benz objections to fee applications	0.50	1,125.00	562.50
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Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2366570

Page 5

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/01/2023	JTG4	Attend hearing on Benz objections to fee applications (.5); emails with J. Evans and J. Iaffaldano re outcome of hearing (.3)	0.80	1,700.00	1,360.00
05/01/2023	JDE	Attend fee application hearing.	0.50	1,600.00	800.00
05/01/2023	SMT1	Prepare outline for hearing regarding compensation application (.4); attend hearing regarding same (.5)	0.90	855.00	769.50
05/23/2023	JTG4	Prepare outline for upcoming hearing	0.40	1,700.00	680.00
05/24/2023	JTG4	Attend hearing on Beneficient lift stay motion and protective order issues	0.70	1,700.00	1,190.00
05/24/2023	SMT1	Attend portion of hearing regarding Beneficient lift stay motion	0.30	855.00	256.50
<b>Subtotal: B155 Court Hearings</b>			<b>4.10</b>		<b>5,618.50</b>

**B160 Fee/Employment Applications**

05/01/2023	JI2	Emails with M. Magzamen re fee statements and CNO re same (.3); review interim compensation order (.2); revise fee statement (.4)	0.90	1,125.00	1,012.50
05/01/2023	JTG4	Emails with M. Magzamen re CNO on PH fee statement (.3); review CNO (.2)	0.50	1,700.00	850.00
05/01/2023	MM57	Correspond with J. Grogan re: order on fee application (.2); revise and e-file related CNO (.2)	0.40	540.00	216.00
05/01/2023	SMT1	Draft certificate of no objection regarding first interim fee application	1.00	855.00	855.00
05/02/2023	JTG4	Email with M. Laskowski re fee order (.1); review same (.1)	0.20	1,700.00	340.00
05/04/2023	JTG4	Emails with J. Iaffaldano about monthly fee application (.5); review same (.3)	0.80	1,700.00	1,360.00
05/04/2023	MM57	Correspond with J. Iaffaldano re: fee statements	0.10	540.00	54.00
05/09/2023	JI2	Revise fee statements (.8); correspond with J. Grogan re same (.1)	0.90	1,125.00	1,012.50
05/09/2023	JTG4	Review and revise monthly fee statements	0.70	1,700.00	1,190.00

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2366570

Page 6

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/11/2023	J12	Revise February fee statement (.5); revise March fee statement (.4); emails with J. Grogan re same (.2)	1.10	1,125.00	1,237.50
05/11/2023	JTG4	Correspond with J. Iaffaldano regarding updated fee statements (.2); review and comment on same (.3)	0.50	1,700.00	850.00
05/16/2023	JTG4	Emails with M. Magzamen about monthly fee statements	0.30	1,700.00	510.00
05/16/2023	MM57	Review fee statements and e-file same	0.40	540.00	216.00
05/31/2023	J12	Revise April fee statement (.4); draft interim fee application (.7).	1.10	1,125.00	1,237.50
<b>Subtotal: B160 Fee/Employment Applications</b>			<b>8.90</b>		<b>10,941.00</b>

**B260 Board of Directors Matters**

05/01/2023	J12	Prepare invoice for S. Clements	0.40	1,125.00	450.00
05/03/2023	J12	Attend board call re plan issues	0.50	1,125.00	562.50
05/16/2023	JDE	Correspond and conference with S. Clements regarding tail coverage	0.50	1,600.00	800.00
05/17/2023	JDE	Prepare for and attend bi-weekly board meeting.	0.50	1,600.00	800.00
05/24/2023	JDE	Prepare for and attend board call.	0.30	1,600.00	480.00
05/31/2023	AM50	Review updates from DLP IV board meeting.	0.50	1,725.00	862.50
05/31/2023	JDE	Prepare for and attend board call.	0.50	1,600.00	800.00
<b>Subtotal: B260 Board of Directors Matters</b>			<b>3.20</b>		<b>4,755.00</b>

**B320 Plan and Disclosure Statement (including Business Plan)**

05/03/2023	DF9	Correspond with J. Iaffaldano re plan exculpation provisions (.4); analysis re same (.7)	1.10	1,725.00	1,897.50
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Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2366570

Page 7

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/03/2023	JI2	Correspond with S. Clements re plan issues (.2); analyze plan issues and related case law and statutory authority (2.8); correspond with D. Fliman regarding exculpation provisions (.4)	3.40	1,125.00	3,825.00
05/04/2023	AM50	Correspond with D. Fliman and J. Evans on recent developments	0.70	1,725.00	1,207.50
05/04/2023	DF9	Call with J. Evans and client re plan exculpation provisions (.3); review caselaw re same (.8)	1.10	1,725.00	1,897.50
05/04/2023	JI2	Analyze exculpation issues and related authority (.8); call with S. Clements re same (.4).	1.20	1,125.00	1,350.00
05/04/2023	JDE	Call with client and D. Fliman regarding plan exculpation provisions	0.30	1,600.00	480.00
05/16/2023	JI2	Emails with J. Evans re plan exculpation issues.	0.70	1,125.00	787.50
05/27/2023	DF9	Correspond with J. Evans re plan revisions (.2); review same (.3)	0.50	1,725.00	862.50
05/29/2023	JI2	Emails with J. Evans and D. Fliman re exculpation issues (.2); analyze same and related precedent (.6).	0.80	1,125.00	900.00
05/30/2023	JI2	Review case law re exculpation issues (1.6); call with J. Evans and Mintz & Gold re same (.3); emails with J. Evans re same (.2).	2.10	1,125.00	2,362.50
05/30/2023	JDE	Call with Mintz & Gold and J. Iaffaldano to discuss exculpations.	0.30	1,600.00	480.00
05/31/2023	JG32	Review case updates from J. Evans regarding exculpation (1.1); correspond with client regarding same (.4)	1.50	1,875.00	2,812.50
<b>Subtotal: B320 Plan and Disclosure Statement (including Business Plan)</b>			<b>13.70</b>		<b>18,862.50</b>
<b>Total</b>			<b>54.40</b>		<b>71,362.00</b>

**Timekeeper Summary**



Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2366570

Page 8

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
JG32	Jayne Goldstein	Partner	4.60	1,875.00	8,625.00
AM50	Allison Miller	Partner	1.70	1,725.00	2,932.50
DF9	Dan Fliman	Partner	2.70	1,725.00	4,657.50
JTG4	James T. Grogan	Partner	16.30	1,700.00	27,710.00
JDE	Jeremy D. Evans	Of Counsel	2.90	1,600.00	4,640.00
JI2	Jack Iaffaldano	Associate	13.60	1,125.00	15,300.00
SMT1	Schlea M. Thomas	Associate	2.20	855.00	1,881.00
ML30	Mat Laskowski	Paralegal	9.30	540.00	5,022.00
MM57	Michael Magzamen	Paralegal	1.10	540.00	594.00

**Costs incurred and advanced**

<u>Date</u>	<u>Description</u>	<u>Quantity</u>	<u>Rate</u>	<u>Amount</u>
05/03/2023	Airfare - Jeremy Evans; 04/18/2023; From/To: LGA/IAH; Airfare Class: Economy; Trip to Houston for client matter			577.80
05/03/2023	Travel Expense - Meals - Jeremy Evans; 04/18/2023; Restaurant: Pizza Hut; City: Houston; Dinner; Number of people: 1; Trip to Houston for client matter			40.00
05/03/2023	Lodging - Jeremy Evans; 04/19/2023; Hotel: Marriott; Check-in date: 04/18/2023; Check-out date: 04/19/2023; Trip to Houston for client matter			589.94
05/03/2023	Taxi/Ground Transportation - Jeremy Evans; 04/18/2023; From/To: Airport/Hotel; Service Type: Uber; Time: 22:03; Trip to Houston for client matter			106.93
05/03/2023	Taxi/Ground Transportation - Jeremy Evans; 04/19/2023; From/To: Hotel/Airport ; Service Type: Uber; Time: 15:56; Trip to Houston for client matter			110.88
05/03/2023	Taxi/Ground Transportation - Jeremy Evans; 04/18/2023; From/To: Home/Airport ; Service Type: Uber; Time: 17:03; Trip to Houston for client matter			114.90

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2366570

Page 9

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05/03/2023	Taxi/Ground Transportation - Jeremy Evans; 04/19/2023; From/To: Airport/Home; Service Type: Uber; Time: 12:02; Trip to Houston for client matter	74.39
<b>Total Costs incurred and advanced</b>		<hr/> \$1,614.84
<b>Current Fees and Costs</b>		<b>\$72,976.84</b>
<b>Total Balance Due - Due Upon Receipt</b>		<b>\$72,976.84</b>

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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:	)	
	)	Chapter 11
	)	
GWG Holdings, Inc., <i>et al.</i> , <sup>1</sup>	)	Case No. 22-90032 (MI)
	)	
Debtors.	)	(Jointly Administered)
	)	

**NOTICE OF EIGHTH MONTHLY FEE STATEMENT OF PAUL HASTINGS LLP,  
COUNSEL TO SEAN CLEMENTS AND THE CONFLICTS COMMITTEE OF THE  
BOARD OF DIRECTORS OF GWG DLP FUNDING IV, LLC FOR THE PERIOD  
FROM JUNE 1, 2023 THROUGH JUNE 19, 2023**

Name of applicant:	Paul Hastings LLP	
Applicant’s Role in the Case:	Attorneys to Sean Clements and the Conflicts Committee of the board of directors of GWG DLP Funding IV, LLC (“ <u>DLP IV</u> ”)	
Date Order of Employment Signed and Docket No.:	January 6, 2023 (effective as of October 31, 2022) [Docket No. 1325]	
	Beginning Date	End Date
Time period covered by this Statement:	06/01/2023	06/19/2023
Summary of Total Fees and Expenses Requested		
Total fees requested in this Statement:	\$60,883.20 (80% of \$76,104.00)	
Total expenses requested in this Statement:	\$1,962.36	
Total fees and expenses requested in this Statement (excluding 20% holdback):	\$78,066.36	
Total fees and expenses requested in this Statement (including 20% holdback):	\$62,845.56	
Summary of Attorney Fees Requested		
Total attorney fees requested in this Statement:	\$73,620.00	

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: GWG Holdings, Inc. (2607); GWG Life, LLC (6955); GWG Life USA, LLC (5538), GWG DLP Funding IV, LLC (2589); GWG DLP Funding VI, LLC (6955); and GWG DLP Funding Holdings VI, LLC (6955). The location of Debtor GWG Holdings, Inc.'s principal place of business and the Debtors' service address is 325 N. St. Paul Street, Suite 2650 Dallas, TX 75201. Further information regarding the Debtors and these chapter 11 cases is available at the website of the Debtors' claims and noticing agent: <https://donlinrecano.com/gwg>.

Total actual attorney hours covered by this Statement:	56.30
Average hourly rate for attorneys:	\$1,308
Summary of Paraprofessional Fees Requested	
Total paraprofessional fees requested in this Statement:	\$2,484.00
Total actual paraprofessional hours covered by this Statement:	4.60
Average hourly rate for paraprofessionals:	\$540

In accordance with the *Corrected Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and (II) Granting Related Relief* [Docket No. 378] (the “Interim Compensation Order”),<sup>2</sup> Paul Hastings LLP (“Paul Hastings”) respectfully submits this eighth monthly statement (the “Monthly Statement”) and requests payment for services rendered and reimbursement of expenses incurred as counsel to Sean Clements and the Conflicts Committee of the board of directors of DLP IV in the above-captioned chapter 11 cases for the period from June 1, 2023 through and including June 19, 2023 (the “Fee Period”) in the amounts set forth above.

### **SERVICES RENDERED AND EXPENSES INCURRED**

1. Attached hereto as **Exhibit A** is a timekeeper summary that includes the name, title, department, bar admission, hourly billing rate, aggregate hours, and amount of fees earned for each Paul Hastings individual who provided services during the Fee Period.

2. Attached hereto as **Exhibit B** is a summary of Paul Hastings’ services rendered and compensation sought, by project category, for the Fee Period.

3. Attached hereto as **Exhibit C** is a summary of expenses incurred and reimbursement sought, by expense type, for the Fee Period.

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<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Interim Compensation Order.

4. Attached hereto as **Exhibit D** are the fee statements of Paul Hastings for services provided during the Fee Period.

### **NOTICE AND OBJECTION PROCEDURES**

1. Notice of this Monthly Statement will be given to the following parties (collectively, the “Application Recipients”): (i) the Debtors c/o GWG Holdings, Inc., 325 N. St. Paul St., Suite 2650, Dallas, TX 75201, Attn: Timothy Evans; (ii) counsel to the Debtors, Mayer Brown LLP, 71 S. Wacker Drive, Chicago, IL 60606, Attn: Thomas S. Kiriakos; (iii) co-counsel to the Debtors, Jackson Walker LLP, 1401 McKinney Street, Suite 1900, Houston, TX 77010, Attn: Kristhy M. Peguero and Matthew D. Cavanaugh; (iv) counsel to the DIP Lender, Sidley Austin LLP, One South Dearborn, Chicago, IL 60603, Attn: Matthew A. Clemente; (v) counsel to Bank of Utah in its capacity as indenture trustee for the Bonds, Akin Gump Strauss Hauer & Feld LLP, 2001 K Street NW, Washington, D.C., 20006-1037, Attn: Scott Alberino; (vi) counsel to any statutory committee appointed in these cases; and (vii) the Office of the U.S. Trustee for the Southern District of Texas, 515 Rusk Street, Suite 3516, Houston, TX 77002, Attn: Hector Duran.

2. Objections to this Monthly Statement, if any, must be served upon the Application Recipients and the undersigned counsel by or before 4:00 p.m. (CT) on the fourteenth day after service of this Monthly Statement (the “Objection Deadline”), setting forth with specificity the objectionable fees or expenses, the amount of the disputed fees or expenses, and the basis for such objection. If no objections are received by the Objection Deadline, the Debtors shall promptly pay Paul Hastings 80 percent of the fees and 100 percent of the expenses identified in this Monthly Statement.

3. To the extent that an objection to this Monthly Statement is received on or before the Objection Deadline, the Debtors shall withhold payment of that portion of this Monthly

Statement to which the objection is directed and promptly pay the remainder of the fees and expenses in the percentages set forth above. To the extent such objection is not resolved, pursuant to the procedures set forth in the Interim Compensation Order, the objecting party shall file its objection with the Court and serve the objection on the Application Recipients and the undersigned counsel. Thereafter, Paul Hastings may either (a) file with the Court a response to the objection together with a request for payment of the appropriate portion of the disputed amount or (b) preserve and schedule the disputed amount for consideration at the next interim or final fee application hearing.

4. To the extent that time or disbursement charges for services rendered or disbursements incurred relate to the Fee Period, but were not processed before the preparation of this Monthly Statement, or Paul Hastings has for any other reason not sought compensation or reimbursement with respect to such services or expenses, Paul Hastings reserves the right to request additional compensation for such services, and reimbursement of such expenses, in a supplemental or future statement.

*[Remainder of page intentionally left blank]*

Dated: August 16, 2023  
Houston, Texas

Respectfully submitted,

/s/ James T. Grogan III

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**PAUL HASTINGS LLP**

James T. Grogan III (TX Bar No. 24027354)  
600 Travis Street, 58th Floor  
Houston, Texas 77002  
Telephone: (713) 860-7300  
Facsimile: (713) 353-3100  
Email: jamesgrogan@paulhastings.com

-and-

Jayme T. Goldstein (admitted *pro hac vice*)  
Daniel A Fliman (admitted *pro hac vice*)  
Allison Miller (admitted *pro hac vice*)  
Jeremy D. Evans (admitted *pro hac vice*)  
John F. Iaffaldano (admitted *pro hac vice*)  
200 Park Avenue  
New York, New York 10166  
Telephone: (212) 318-6000  
Facsimile: (212) 319-4090  
Email: jaymegoldstein@paulhastings.com

*Counsel to Sean Clements and the Conflicts Committee of  
the board of directors of DLP IV*

**Exhibit A**

**COMPENSATION BY PROFESSIONAL AND PARAPROFESSIONAL FOR FEE PERIOD**

				Total for Fee Period	
Name	Department or Group	Date of First Admission	Hourly Rate	Hours Billed	Amount
Fliman, Dan	Corporate	2003	\$1,725.00	0.50	\$862.50
Goldstein, Jayme	Corporate	2003	\$1,875.00	5.50	\$10,312.50
Grogan, James	Corporate	2000	\$1,700.00	16.00	\$27,200.00
Miller, Allison	Corporate	2004	\$1,725.00	0.80	\$1,380.00
<b>Total Partner:</b>				<b>22.80</b>	<b>\$39,755.00</b>
Evans, Jeremy	Corporate	2013	\$1,600.00	6.80	\$10,880.00
Evans, Jeremy (Travel)	Corporate	2013	\$800.00 (Bill at ½ rate)	16.30	\$13,040.00
<b>Total Counsel:</b>				<b>23.10</b>	<b>\$23,920.00</b>
Iaffaldano, Jack	Corporate	2020	\$1,125.00	3.90	\$4,387.50
Thomas, Schlea	Corporate	2022	\$855.00	6.50	\$5,557.50
<b>Total Associate:</b>				<b>10.40</b>	<b>\$9,945.00</b>
Laskowski, Mat	Paralegal		\$540.00	4.00	\$2,160.00
Magzamen, Michel	Paralegal		\$540.00	0.60	\$324.00
<b>Total Paraprofessional:</b>				<b>4.60</b>	<b>\$2,484.00</b>
<b>Total:</b>				<b>60.90</b>	<b>\$76,104.00</b>



**Exhibit B**

**COMPENSATION BY PROJECT CATEGORY FOR FEE PERIOD**

		Total for Fee Period	
U.S. Trustee Task Code and Project Category		Total Hours	Total Fees
B110	Case Administration	0.90	\$1,547.50
B113	Pleadings Review	7.40	\$8,520.00
B155	Court Hearings	17.90	\$24,235.00
B160	Employment / Fee Applications (Paul Hastings)	0.90	\$1,012.50
B195	Non-Working Travel	16.30	\$13,040.00
B260	Board of Directors Matters	2.10	\$2,995.00
B320	Plan and Disclosure Statement	15.40	\$24,754.00
<b>TOTAL</b>		<b>60.90</b>	<b>\$76,104.00</b>

**Exhibit C**

**EXPENSE SUMMARY FOR FEE PERIOD**

Category	Total for Fee Period
Airfare	\$567.80
Lodging	\$903.22
Taxi/Ground Transportation	\$451.34
Meals	\$40.00
<b>TOTAL</b>	<b>\$1,962.36</b>

**Exhibit D**

**FEE STATEMENTS FOR FEE PERIOD**



**PAUL HASTINGS LLP**  
200 Park Avenue, New York, NY 10166-3205  
t: +1.212.318.6000 | f: +1.212.319.4090 | [www.paulhastings.com](http://www.paulhastings.com)

Conflicts Committee of GWG DLP Funding IV, LLC  
Suite 1200  
220 South Sixth Street  
Minneapolis, MN 55402

August 8, 2023

Please Refer to  
Invoice Number: 2367578

Attn: Sean Clements

PH LLP Tax ID No. 95-2209675

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## SUMMARY SHEET

### **Bankruptcy Case**

PH LLP Client/Matter # 51132-00002  
Jayme Goldstein

Legal fees for professional services  
for the period ending June 19, 2023

\$76,104.00

Costs incurred and advanced

1,962.36

**Current Fees and Costs Due**

**\$78,066.36**

**Total Balance Due - Due Upon Receipt**

**\$78,066.36**

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We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

***TO PROTECT AGAINST FRAUD***, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Teri Goffredo @ 213-683-5045 or via email @ [terigoffredo@paulhastings.com](mailto:terigoffredo@paulhastings.com) and requesting written and verbal confirmation.

### **Wiring and ACH Instructions:**

Citibank  
ABA # 322271724  
SWIFT Address: CITIUS33  
787 W. 5th Street  
Los Angeles, CA 90071  
Account Number: 206628380  
Account Name: Paul Hastings LLP

### **Remittance Address:**

Paul Hastings LLP  
Lockbox 4803  
PO Box 894803  
Los Angeles, CA 90189-4803

For wires, please reference the invoice, client and matter number(s) being paid

For ACH payments, please use the CTX format and/or send any remittances to [cashepn@paulhastings.com](mailto:cashepn@paulhastings.com). This is a no-reply mailbox

Please refer all questions to [billing@paulhastings.com](mailto:billing@paulhastings.com)



**PAUL HASTINGS LLP**  
200 Park Avenue, New York, NY 10166-3205  
t: +1.212.318.6000 | f: +1.212.319.4090 | [www.paulhastings.com](http://www.paulhastings.com)

Conflicts Committee of GWG DLP Funding IV, LLC  
Suite 1200  
220 South Sixth Street  
Minneapolis, MN 55402

August 8, 2023

Please Refer to  
Invoice Number: 2367578

Attn: Sean Clements

PH LLP Tax ID No. 95-2209675

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### REMITTANCE COPY

#### **Bankruptcy Case**

PH LLP Client/Matter # 51132-00002  
Jayme Goldstein

Legal fees for professional services  
for the period ending June 19, 2023

\$76,104.00

Costs incurred and advanced

1,962.36

**Current Fees and Costs Due**

**\$78,066.36**

**Total Balance Due - Due Upon Receipt**

**\$78,066.36**

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

***TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Teri Goffredo @ 213-683-5045 or via email @ [terigoffredo@paulhastings.com](mailto:terigoffredo@paulhastings.com) and requesting written and verbal confirmation.***

#### **Wiring and ACH Instructions:**

Citibank  
ABA # 322271724  
SWIFT Address: CITIUS33  
787 W. 5th Street  
Los Angeles, CA 90071  
Account Number: 206628380  
Account Name: Paul Hastings LLP

#### **Remittance Address:**

Paul Hastings LLP  
Lockbox 4803  
PO Box 894803  
Los Angeles, CA 90189-4803

For wires, please reference the invoice, client and matter number(s) being paid

For ACH payments, please use the CTX format and/or send any remittances to [cashepn@paulhastings.com](mailto:cashepn@paulhastings.com). This is a no-reply mailbox

Please refer all questions to [billing@paulhastings.com](mailto:billing@paulhastings.com)



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August 8, 2023

Please Refer to  
Invoice Number: 2367578

Attn: Sean Clements

PH LLP Tax ID No. 95-2209675

FOR PROFESSIONAL SERVICES RENDERED  
for the period ending June 19, 2023

**Bankruptcy Case** **\$76,104.00**

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
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**B110 Case Administration**

06/05/2023	JTG4	Email with M. Laskowski re case update	0.20	1,700.00	340.00
06/07/2023	JTG4	Email with M. Laskowski re case update	0.20	1,700.00	340.00
06/08/2023	JTG4	Review and update case calendar (.2); emails with M. Laskowski about same and new pleadings (.2)	0.40	1,700.00	680.00
06/14/2023	JG32	Review case updates	0.10	1,875.00	187.50
<b>Subtotal: B110 Case Administration</b>			<b>0.90</b>		<b>1,547.50</b>

**B113 Pleadings Review**

06/01/2023	JTG4	Review recent pleadings and docket update	0.40	1,700.00	680.00
06/01/2023	ML30	Review recent filings and update case calendars and working group re same	0.60	540.00	324.00
06/02/2023	JTG4	Review recent pleadings and docket update	0.40	1,700.00	680.00
06/02/2023	ML30	Review recent filings and update working group re same	0.30	540.00	162.00
06/03/2023	JTG4	Review ECF notices	0.20	1,700.00	340.00

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2367578

Page 2

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/05/2023	JTG4	Review ECF notices	0.40	1,700.00	680.00
06/05/2023	ML30	Review recent filings and update case calendars and working group re same	0.40	540.00	216.00
06/06/2023	JTG4	Review recent pleadings, ECF notices, mediation stipulation, and related docket update	0.60	1,700.00	1,020.00
06/06/2023	ML30	Review recent filings and update working group re same	0.40	540.00	216.00
06/07/2023	JTG4	Review Beneficient objection	0.30	1,700.00	510.00
06/07/2023	ML30	Review recent filings and update working group re same	0.40	540.00	216.00
06/08/2023	JTG4	Review ECF notices and motion to sell Beneficient shares	0.50	1,700.00	850.00
06/08/2023	ML30	Review recent filings and update case calendars and working group re same	0.60	540.00	324.00
06/09/2023	JTG4	Review docket update from M. Laskowski	0.20	1,700.00	340.00
06/09/2023	ML30	Review recent filings and update working group re same	0.40	540.00	216.00
06/12/2023	JTG4	Review docket update from M. Magzamen	0.20	1,700.00	340.00
06/12/2023	MM57	Review recent docket/ECF filings and update calendars and working group re: same	0.10	540.00	54.00
06/13/2023	JTG4	Review docket update from M. Magzamen (.2); review ECF notices (.5)	0.70	1,700.00	1,190.00
06/13/2023	MM57	Review recent docket/ECF filings and update calendars and working group re: same	0.10	540.00	54.00
06/14/2023	MM57	Review recent docket/ECF filings and update calendars and working group re: same	0.10	540.00	54.00
06/15/2023	MM57	Review recent filings and update calendars and working group re: same	0.10	540.00	54.00
<b>Subtotal: B113 Pleadings Review</b>			<b>7.40</b>		<b>8,520.00</b>

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2367578

Page 3

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>B155 Court Hearings</b>					
06/02/2023	JTG4	Call with S. Thomas regarding upcoming hearing	0.20	1,700.00	340.00
06/02/2023	SMT1	Telephone conference with J. Grogan regarding hearing on 6/5/23	0.20	855.00	171.00
06/12/2023	JTG4	Review agenda for June 13 hearing and prepare notes for same	0.60	1,700.00	1,020.00
06/13/2023	J12	Attend hearing on motion to allow claims for voting purposes and motion to sell Beneficient shares	0.40	1,125.00	450.00
06/13/2023	JTG4	Correspond with S. Thomas and J. Evans regarding June 15, 2023 hearing (.3); review submissions in preparation for same (.9); attend hearing on motion to allow claims for voting purposes and motion to sell Beneficient shares (.4)	1.60	1,700.00	2,720.00
06/13/2023	SMT1	Correspond with J. Grogan and J. Evans regarding confirmation hearing (.2); attend hearing regarding motion to allow claims for voting purposes and motion to sell Beneficient shares following de-SPAC transactions (.4)	0.60	855.00	513.00
06/15/2023	J12	Attend plan confirmation hearing	1.60	1,125.00	1,800.00
06/15/2023	JTG4	Review additional confirmation pleadings and proposed order to prepare for confirmation hearing (3.1); attend confirmation hearing (1.6); correspond with J. Evans and S. Thomas regarding hearing prep and case updates (.6)	5.30	1,700.00	9,010.00
06/15/2023	JDE	Review submissions and supplement hearing notes for plan confirmation hearing (.9); attend plan confirmation hearing (1.6)	2.50	1,600.00	4,000.00
06/15/2023	MM57	Submit electronic appearances for hearing	0.20	540.00	108.00
06/15/2023	SMT1	Review submissions and cases in preparation for confirmation hearing (1.7); prepare reference documents for confirmation hearing (1.3); attend plan confirmation hearing (1.6)	4.60	855.00	3,933.00



Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2367578

Page 4

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/19/2023	JTG4	Review W&E list from Beneficent	0.10	1,700.00	170.00
<b>Subtotal: B155 Court Hearings</b>			<b>17.90</b>		<b>24,235.00</b>

**B160 Fee/Employment Applications**

06/09/2023	JI2	Draft April fee statement (.2); draft interim fee application (.7)	0.90	1,125.00	1,012.50
<b>Subtotal: B160 Fee/Employment Applications</b>			<b>0.90</b>		<b>1,012.50</b>

**B195 Non-Working Travel**

06/14/2023	JDE	Travel from New York, NY to Houston, TX for confirmation hearing. (Bill at 1/2 rate)	10.50	800.00	8,400.00
06/16/2023	JDE	Travel from Houston, TX to New York, NY from confirmation hearing. (Bill at 1/2 rate)	5.80	800.00	4,640.00
<b>Subtotal: B195 Non-Working Travel</b>			<b>16.30</b>		<b>13,040.00</b>

**B260 Board of Directors Matters**

06/03/2023	JI2	Prepare director invoice (.3); emails with S. Clements re same (.1); emails with L. Chiappetta (Mayer Brown) re same (.1)	0.50	1,125.00	562.50
06/14/2023	JI2	Attend board meeting with J. Evans (.4); emails with D. Fliman and J. Evans re same (.1)	0.50	1,125.00	562.50
06/14/2023	JG32	Correspond with J. Evans and client regarding case plan and next steps	0.40	1,875.00	750.00
06/14/2023	JDE	Review plan issues and prepare outline for board meeting (.3); attend board meeting with J. Iaffaldano (.4)	0.70	1,600.00	1,120.00
<b>Subtotal: B260 Board of Directors Matters</b>			<b>2.10</b>		<b>2,995.00</b>

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2367578

Page 5

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>B320 Plan and Disclosure Statement (including Business Plan)</b>					
06/05/2023	JTG4	Review and analyze plan objections	0.70	1,700.00	1,190.00
06/05/2023	JDE	Review and analyze plan, disclosure statement, and supporting documents	1.50	1,600.00	2,400.00
06/05/2023	ML30	Correspond with J. Iaffaldano re plan objections and responses (.2); research regarding same (.6); follow up correspondence with J. Iaffaldano regarding same (.1)	0.90	540.00	486.00
06/08/2023	DF9	Correspond with J. Evans re plan provisions and exculpations.	0.50	1,725.00	862.50
06/09/2023	JTG4	Review updated plan documents and new plan objections	0.80	1,700.00	1,360.00
06/09/2023	JDE	Review and analyze plan modifications.	0.80	1,600.00	1,280.00
06/12/2023	AM50	Review recent case updates regarding Plan releases for independent directors	0.30	1,725.00	517.50
06/13/2023	JDE	Review recent docket filings in anticipation of confirmation hearing.	0.50	1,600.00	800.00
06/14/2023	AM50	Follow up correspondence with J. Evans regarding certain plan provisions	0.50	1,725.00	862.50
06/14/2023	JTG4	Emails with S. Thomas and J. Evans re June 15 confirmation hearing (.6); prepare for same by reviewing amended plan and related confirmation documents (1.4)	2.00	1,700.00	3,400.00
06/14/2023	JG32	Analyze submissions and issues regarding plan confirmation and hearing	1.70	1,875.00	3,187.50
06/14/2023	JG32	Review certain recently filed pleadings regarding confirmation	0.70	1,875.00	1,312.50
06/14/2023	JDE	Analyze plan comments	0.80	1,600.00	1,280.00
06/14/2023	SMT1	Review submissions in preparation for confirmation hearing on 6/15/23	1.10	855.00	940.50

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2367578

Page 6

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/15/2023	JG32	Analyze and comment on plan confirmation matters (1.4); telephone conference with client regarding same (.4); review submissions related to plan confirmation and hearing (.8)	2.60	1,875.00	4,875.00
<b>Subtotal: B320 Plan and Disclosure Statement (including Business Plan)</b>			<b>15.40</b>		<b>24,754.00</b>
<b>Total</b>			<b>60.90</b>		<b>76,104.00</b>

**Timekeeper Summary**

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
JG32	Jayne Goldstein	Partner	5.50	1,875.00	10,312.50
AM50	Allison Miller	Partner	0.80	1,725.00	1,380.00
DF9	Dan Fliman	Partner	0.50	1,725.00	862.50
JTG4	James T. Grogan	Partner	16.00	1,700.00	27,200.00
JDE	Jeremy D. Evans	Of Counsel	6.80	1,600.00	10,880.00
JDE	Jeremy D. Evans	Of Counsel	16.30	800.00	13,040.00
JI2	Jack Iaffaldano	Associate	3.90	1,125.00	4,387.50
SMT1	Schlea M. Thomas	Associate	6.50	855.00	5,557.50
ML30	Mat Laskowski	Paralegal	4.00	540.00	2,160.00
MM57	Michael Magzamen	Paralegal	0.60	540.00	324.00

**Costs incurred and advanced**

<u>Date</u>	<u>Description</u>	<u>Quantity</u>	<u>Rate</u>	<u>Amount</u>
06/28/2023	Airfare - Jeremy Evans; 06/14/2023; From/To: LGA/IAH; Airfare Class: Economy; trip to Houston, Texas regarding attending Confirmation hearing			567.80

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2367578

Page 7

06/28/2023	Travel Expense - Meals - Jeremy Evans; 06/15/2023; Restaurant: Morton's ; City: Houston ; Dinner; Number of people: 1; trip to Houston, Texas regarding attending Confirmation hearing	40.00
06/28/2023	Lodging - Jeremy Evans; 06/16/2023; Hotel: Marriott; Check-in date: City: Houston; 06/14/2023; Check-out date: 06/16/2023; trip to Houston, Texas regarding attending Confirmation hearing	903.22
06/28/2023	Taxi/Ground Transportation - Jeremy Evans; 06/16/2023; From/To: Airport/Home ; Service Type: Uber; Time: 11:30; trip to Houston, Texas regarding attending Confirmation hearing	102.74
06/28/2023	Taxi/Ground Transportation - Jeremy Evans; 06/16/2023; From/To: Hotel/Airport ; Service Type: Uber; Time: 05:28; trip to Houston, Texas regarding attending Confirmation hearing	117.57
06/28/2023	Taxi/Ground Transportation - Jeremy Evans; 06/15/2023; From/To: Airport/Hotel ; Service Type: Uber; Time: 01:24; trip to Houston, Texas regarding attending Confirmation hearing	145.73
06/28/2023	Taxi/Ground Transportation - Jeremy Evans; 06/14/2023; From/To: Home/Airport ; Service Type: Uber; Time: 17:15; trip to Houston, Texas regarding attending Confirmation hearing	85.30
<b>Total Costs incurred and advanced</b>		<b>\$1,962.36</b>
<b>Current Fees and Costs</b>		<b>\$78,066.36</b>
<b>Total Balance Due - Due Upon Receipt</b>		<b>\$78,066.36</b>

**EXHIBIT B**

**MONTHLY STATEMENTS FOR FINAL PERIOD**

**UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:	)	
	)	Chapter 11
	)	
GWG Holdings, Inc., <i>et al.</i> , <sup>1</sup>	)	Case No. 22-90032 (MI)
	)	
Debtors.	)	(Jointly Administered)
	)	

**NOTICE OF FIRST MONTHLY FEE STATEMENT OF PAUL HASTINGS LLP,  
COUNSEL TO SEAN CLEMENTS AND THE CONFLICTS COMMITTEE OF THE  
BOARD OF DIRECTORS OF GWG DLP FUNDING IV, LLC FOR THE PERIOD  
FROM OCTOBER 31, 2022 THROUGH NOVEMBER 30, 2022**

Name of applicant:	Paul Hastings LLP	
Applicant’s Role in the Case:	Attorneys to Sean Clements and the Conflicts Committee of the board of directors of GWG DLP Funding IV, LLC (“ <u>DLP IV</u> ”)	
Date Order of Employment Signed and Docket No.:	January 6, 2023 (effective as of October 31, 2022) [Docket No. 1325]	
	Beginning Date	End Date
Time period covered by this Statement:	10/31/2022	11/30/2022
Summary of Total Fees and Expenses Requested		
Total fees requested in this Statement:	\$318,068.00 (80% of \$397,585.00)	
Total expenses requested in this Statement:	\$3,260.16	
Total fees and expenses requested in this Statement (excluding 20% holdback):	\$400,845.16	
Total fees and expenses requested in this Statement (including 20% holdback):	\$321,328.16	
Summary of Attorney Fees Requested		
Total attorney fees requested in this Statement:	\$386,592.00	

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: GWG Holdings, Inc. (2607); GWG Life, LLC (6955); GWG Life USA, LLC (5538), GWG DLP Funding IV, LLC (2589); GWG DLP Funding VI, LLC (6955); and GWG DLP Funding Holdings VI, LLC (6955). The location of Debtor GWG Holdings, Inc.'s principal place of business and the Debtors' service address is 325 N. St. Paul Street, Suite 2650 Dallas, TX 75201. Further information regarding the Debtors and these chapter 11 cases is available at the website of the Debtors' claims and noticing agent: <https://donlinrecano.com/gwg>.

Total actual attorney hours covered by this Statement:	281.40
Average hourly rate for attorneys:	\$1,374
Summary of Paraprofessional Fees Requested	
Total paraprofessional fees requested in this Statement:	\$10,993.00
Total actual paraprofessional hours covered by this Statement:	21.20
Average hourly rate for paraprofessionals:	\$519

In accordance with the *Corrected Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and (II) Granting Related Relief* [Docket No. 378] (the “Interim Compensation Order”),<sup>2</sup> Paul Hastings LLP (“Paul Hastings”) respectfully submits this first monthly statement (the “Monthly Statement”) and requests payment for services rendered and reimbursement of expenses incurred as counsel to Sean Clements and the Conflicts Committee of the board of directors of DLP IV in the above-captioned chapter 11 cases for the period from October 31, 2022 through and including November 30, 2022 (the “Fee Period”) in the amounts set forth above.

### **SERVICES RENDERED AND EXPENSES INCURRED**

1. Attached hereto as **Exhibit A** is a timekeeper summary that includes the name, title, department, bar admission, hourly billing rate, aggregate hours, and amount of fees earned for each Paul Hastings individual who provided services during the Fee Period.

2. Attached hereto as **Exhibit B** is a summary of Paul Hastings’ services rendered and compensation sought, by project category, for the Fee Period.

3. Attached hereto as **Exhibit C** is a summary of expenses incurred and reimbursement sought, by expense type, for the Fee Period.

4. Attached hereto as **Exhibit D** are the fee statements of Paul Hastings for services provided during the Fee Period.

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Interim Compensation Order.

### **NOTICE AND OBJECTION PROCEDURES**

5. Notice of this Monthly Statement will be given to the following parties (collectively, the “Application Recipients”): (i) the Debtors c/o GWG Holdings, Inc., 325 N. St. Paul St., Suite 2650, Dallas, TX 75201, Attn: Timothy Evans; (ii) counsel to the Debtors, Mayer Brown LLP, 71 S. Wacker Drive, Chicago, IL 60606, Attn: Thomas S. Kiriakos; (iii) co-counsel to the Debtors, Jackson Walker LLP, 1401 McKinney Street, Suite 1900, Houston, TX 77010, Attn: Kristhy M. Peguero and Matthew D. Cavanaugh; (iv) counsel to the DIP Lender, Sidley Austin LLP, One South Dearborn, Chicago, IL 60603, Attn: Matthew A. Clemente; (v) counsel to Bank of Utah in its capacity as indenture trustee for the Bonds, Akin Gump Strauss Hauer & Feld LLP, 2001 K Street NW, Washington, D.C., 20006-1037, Attn: Scott Alberino; (vi) counsel to any statutory committee appointed in these cases; and (vii) the Office of the U.S. Trustee for the Southern District of Texas, 515 Rusk Street, Suite 3516, Houston, TX 77002, Attn: Hector Duran.

6. Objections to this Monthly Statement, if any, must be served upon the Application Recipients and the undersigned counsel by or before 4:00 p.m. (CT) on the fourteenth day after service of this Monthly Statement (the “Objection Deadline”), setting forth with specificity the objectionable fees or expenses, the amount of the disputed fees or expenses, and the basis for such objection. If no objections are received by the Objection Deadline, the Debtors shall promptly pay Paul Hastings 80 percent of the fees and 100 percent of the expenses identified in this Monthly Statement.

7. To the extent that an objection to this Monthly Statement is received on or before the Objection Deadline, the Debtors shall withhold payment of that portion of this Monthly Statement to which the objection is directed and promptly pay the remainder of the fees and expenses in the percentages set forth above. To the extent such objection is not resolved,



pursuant to the procedures set forth in the Interim Compensation Order, the objecting party shall file its objection with the Court and serve the objection on the Application Recipients and the undersigned counsel. Thereafter, Paul Hastings may either (a) file with the Court a response to the objection together with a request for payment of the appropriate portion of the disputed amount or (b) preserve and schedule the disputed amount for consideration at the next interim or final fee application hearing.

8. To the extent that time or disbursement charges for services rendered or disbursements incurred relate to the Fee Period, but were not processed before the preparation of this Monthly Statement, or Paul Hastings has for any other reason not sought compensation or reimbursement with respect to such services or expenses, Paul Hastings reserves the right to request additional compensation for such services, and reimbursement of such expenses, in a supplemental or future statement.

*[Remainder of page intentionally left blank]*

Dated: January 13, 2023  
Houston, Texas

Respectfully submitted,

/s/ James T. Grogan III

**PAUL HASTINGS LLP**

James T. Grogan III (TX Bar No. 24027354)  
600 Travis Street, 58th Floor  
Houston, Texas 77002  
Telephone: (713) 860-7300  
Facsimile: (713) 353-3100  
Email: jamesgrogan@paulhastings.com

-and-

Jayne T. Goldstein (admitted *pro hac vice*)  
Daniel A. Fliman (admitted *pro hac vice*)  
Allison Miller (admitted *pro hac vice*)  
Jeremy D. Evans (admitted *pro hac vice*)  
John F. Iaffaldano (admitted *pro hac vice*)  
200 Park Avenue  
New York, New York 10166  
Telephone: (212) 318-6000  
Facsimile: (212) 319-4090  
Email: jaymegoldstein@paulhastings.com

*Counsel to Sean Clements and the Conflicts Committee of  
the board of directors of DLP IV*

**Exhibit A**

**COMPENSATION BY PROFESSIONAL AND PARAPROFESSIONAL FOR FEE PERIOD**

				Total for Fee Period	
Name	Department or Group	Date of First Admission	Hourly Rate	Hours Billed	Amount
Fliman, Dan	Corporate	2003	1,610.00	56.80	\$91,448.00
Goldstein, Jayme	Corporate	2003	1,735.00	27.90	\$48,406.50
Grogan, James	Corporate	2000	1,585.00	4.80	\$7,608.00
Miller, Allison	Corporate	2004	1,610.00	57.20	\$92,092.00
<b>Total Partner:</b>				<b>146.70</b>	<b>\$239,554.50</b>
Begun, Marina	Corporate	2009	1,410.00	6.50	\$9,165.00
Evans, Jeremy	Corporate	2013	1,485.00	38.50	\$57,172.50
Traxler, Katherine	Corporate	1990	920.00	3.10	\$2,852.00
<b>Total Counsel:</b>				<b>48.10</b>	<b>\$69,189.50</b>
Grabis, Maria	Corporate	2016	1,200.00	3.00	\$3,600.00
Iaffaldano, Jack	Corporate	2020	930.00	63.60	\$59,148.00
Miliotes, Lanie	Corporate	Not yet admitted	755.00	20.00	\$15,100.00
<b>Total Associate:</b>				<b>86.60</b>	<b>\$77,848.00</b>
Laskowski, Mat	Paralegal		515.00	17.90	\$9,218.50
Lee, Sandy	Paralegal		565.00	1.50	\$847.50
Magzamen, Michel	Paralegal		515.00	1.80	\$927.00
<b>Total Paraprofessional:</b>				<b>21.20</b>	<b>\$10,993.00</b>
<b>Total:</b>				<b>302.60</b>	<b>\$397,585.00</b>

**Exhibit B**

**COMPENSATION BY PROJECT CATEGORY FOR FEE PERIOD**

		<b>Total for Fee Period</b>	
<b>U.S. Trustee Task Code and Project Category</b>		<b>Total Hours</b>	<b>Total Fees</b>
B110	Case Administration	6.10	\$7,092.50
B113	Pleadings Review	13.20	\$10,824.00
B155	Court Hearings	35.20	\$49,544.00
B160	Employment / Fee Applications (Paul Hastings)	48.00	\$49,580.50
B230	Financing / Cash Collections	11.90	\$16,784.50
B260	Board of Directors Matters	22.30	\$33,506.50
B261	Investigations	133.30	\$178,567.00
B310	Claims Administration and Objections	28.30	\$45,063.00
B320	Plan and Disclosure Statement	4.30	\$6,623.00
<b>TOTAL</b>		<b>302.60</b>	<b>\$397,585.00</b>

**Exhibit C**

**EXPENSE SUMMARY FOR FEE PERIOD**

Category	Total for Fee Period
Computer Search	\$31.16
CSC/LexisNexis Document Solutions	\$2,774.80
Meals	\$132.64
Taxi/Ground Transportation	\$142.68
Reproduction Charges	\$178.88
<b>TOTAL</b>	<b>\$3,260.16</b>

**Exhibit D**

**FEE STATEMENTS FOR FEE PERIOD**



**PAUL HASTINGS LLP**  
200 Park Avenue, New York, NY 10166-3205  
t: +1.212.318.6000 | f: +1.212.319.4090 | [www.paulhastings.com](http://www.paulhastings.com)

Conflicts Committee of GWG DLP Funding IV, LLC January 12, 2023  
Suite 1200  
220 South Sixth Street  
Minneapolis, MN 55402

Please Refer to  
Invoice Number: 2344665

Attn: Sean Clements

PH LLP Tax ID No. 95-2209675

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## SUMMARY SHEET

### Bankruptcy Case

PH LLP Client/Matter # 51132-00002  
Dan Fliman

Legal fees for professional services for the period ending November 30, 2022	\$397,585.00
Costs incurred and advanced	3,260.16
<b>Current Fees and Costs Due</b>	<b>\$400,845.16</b>
<b>Total Balance Due - Due Upon Receipt</b>	<b>\$400,845.16</b>

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

***TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Teri Goffredo @ 213-683-5045 or via email @ [terigoffredo@paulhastings.com](mailto:terigoffredo@paulhastings.com) and requesting written and verbal confirmation.***

### Wiring and ACH Instructions:

Citibank  
ABA # 322271724  
SWIFT Address: CITIUS33  
787 W. 5th Street  
Los Angeles, CA 90071  
Account Number: 206628380  
Account Name: Paul Hastings LLP

### Remittance Address:

Paul Hastings LLP  
Lockbox 4803  
PO Box 894803  
Los Angeles, CA 90189-4803

For wires, please reference the invoice, client and matter number(s) being paid  
For ACH payments, please use the CTX format and/or send any remittances to [cashepn@paulhastings.com](mailto:cashepn@paulhastings.com). This is a no-reply mailbox  
Please refer all questions to [billing@paulhastings.com](mailto:billing@paulhastings.com)



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200 Park Avenue, New York, NY 10166-3205  
t: +1.212.318.6000 | f: +1.212.319.4090 | [www.paulhastings.com](http://www.paulhastings.com)

Conflicts Committee of GWG DLP Funding IV, LLC January 12, 2023  
Suite 1200  
220 South Sixth Street  
Minneapolis, MN 55402

Please Refer to  
Invoice Number: 2344665

Attn: Sean Clements

PH LLP Tax ID No. 95-2209675

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### REMITTANCE COPY

#### **Bankruptcy Case**

PH LLP Client/Matter # 51132-00002  
Dan Fliman

Legal fees for professional services for the period ending November 30, 2022	\$397,585.00
Costs incurred and advanced	3,260.16
<b>Current Fees and Costs Due</b>	<b>\$400,845.16</b>
<b>Total Balance Due - Due Upon Receipt</b>	<b>\$400,845.16</b>

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Los Angeles, CA 90189-4803

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For ACH payments, please use the CTX format and/or send any remittances to [cashepn@paulhastings.com](mailto:cashepn@paulhastings.com). This is a no-reply mailbox  
Please refer all questions to [billing@paulhastings.com](mailto:billing@paulhastings.com)





**PAUL HASTINGS LLP**  
200 Park Avenue, New York, NY 10166-3205  
t: +1.212.318.6000 | f: +1.212.319.4090 | www.paulhastings.com

Conflicts Committee of GWG DLP Funding IV, LLC January 12, 2023  
Suite 1200  
220 South Sixth Street  
Minneapolis, MN 55402

Please Refer to  
Invoice Number: 2344665

Attn: Sean Clements

PH LLP Tax ID No. 95-2209675

FOR PROFESSIONAL SERVICES RENDERED  
for the period ending November 30, 2022

**Bankruptcy Case** **\$397,585.00**

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>B110 Case Administration</b>					
11/01/2022	ML30	Correspond with J. Iaffaldano re precedent needed (.1); research regarding same (.8); correspond with J. Iaffaldano regarding same (.1); prepare case calendars (.3)	1.30	515.00	669.50
11/01/2022	MM57	Correspond with M. Laskowski regarding ECF (.1); correspond with M. Laskowski regarding initial case matters (.1)	0.20	515.00	103.00
11/02/2022	ML30	Update case calendars	0.10	515.00	51.50
11/02/2022	MM57	Correspond with Donlin re: service of process	0.10	515.00	51.50
11/03/2022	ML30	Update case calendars	0.20	515.00	103.00
11/04/2022	JG32	Review case status, filed orders (.7); correspond with client regarding same and next steps (.5)	1.20	1,735.00	2,082.00
11/04/2022	ML30	Update case calendars	0.20	515.00	103.00
11/07/2022	ML30	Update case calendars	0.10	515.00	51.50
11/08/2022	ML30	Update case calendars	0.10	515.00	51.50
11/10/2022	JG32	Main case monitoring	1.10	1,735.00	1,908.50

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2344665

Page 2

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/14/2022	JG32	Review main case issues	0.40	1,735.00	694.00
11/17/2022	ML30	Update PH team calendars	0.10	515.00	51.50
11/18/2022	ML30	Update PH team calendars	0.10	515.00	51.50
11/21/2022	AM50	Review recent case developments and court filings	0.60	1,610.00	966.00
11/21/2022	ML30	Update PH team calendars	0.10	515.00	51.50
11/22/2022	ML30	Update team calendars	0.10	515.00	51.50
11/23/2022	ML30	Update team calendars	0.10	515.00	51.50
<b>Subtotal: B110 Case Administration</b>			<b>6.10</b>		<b>7,092.50</b>

**B113 Pleadings Review**

11/01/2022	ML30	Monitor the docket (.1); prepare end of day update for working group re: same (.3); review first day pleadings for DLP debtors and update working group re: same (.5)	0.90	515.00	463.50
11/02/2022	ML30	Monitor the docket (.4); prepare end of day update for working group re: same (.9)	1.30	515.00	669.50
11/03/2022	JG32	Review and comment on case filings	0.60	1,735.00	1,041.00
11/03/2022	ML30	Monitor the docket (.1); prepare end of day update for working group re: same (.4)	0.50	515.00	257.50
11/04/2022	ML30	Monitor the docket (.1); prepare end of day update for working group re: same (.3)	0.40	515.00	206.00
11/07/2022	ML30	Monitor the docket (.1); prepare end of day update for working group re: same (.5)	0.60	515.00	309.00
11/08/2022	ML30	Monitor the docket (.1); prepare end of day update for working group re: same (.4)	0.50	515.00	257.50
11/09/2022	JG32	Review main case pleadings	0.80	1,735.00	1,388.00
11/09/2022	ML30	Monitor the docket (.1); prepare end of day update for working group re: same (.1)	0.20	515.00	103.00
11/10/2022	ML30	Monitor the docket (.1); prepare end of day update for working group re: same (.2)	0.30	515.00	154.50
11/11/2022	JG32	Review Chapter 11 filings and monitor case	0.50	1,735.00	867.50

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2344665

Page 3

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/11/2022	ML30	Monitor the docket (.1); prepare end of day update for working group re: same (.1)	0.20	515.00	103.00
11/14/2022	ML30	Monitor the docket (.2); prepare end of day update for working group re: same (.2)	0.40	515.00	206.00
11/15/2022	ML30	Monitor the docket (.2); prepare end of day update for working group re: same (.3)	0.50	515.00	257.50
11/16/2022	ML30	Monitor the docket; (.2) prepare end of day update for working group re: same (.2)	0.40	515.00	206.00
11/17/2022	ML30	Monitor the docket (.1); prepare end of day update for working group re: same (.2)	0.30	515.00	154.50
11/18/2022	ML30	Monitor the docket (.1); prepare update for working group re: same (.1)	0.20	515.00	103.00
11/21/2022	JG32	Chapter 11 pleadings review and analysis	0.80	1,735.00	1,388.00
11/21/2022	ML30	Prepare end of day update for working group re: docket	0.10	515.00	51.50
11/22/2022	JG32	Review GWG proceeding matters and pleadings/filings	0.60	1,735.00	1,041.00
11/22/2022	ML30	Monitor the docket (.1); prepare end of day update for working group re: same (.3)	0.40	515.00	206.00
11/23/2022	ML30	Prepare end of day update for working group re: docket	0.10	515.00	51.50
11/28/2022	ML30	Monitor the docket (.1); review recent filings and update calendars and working group re: same (.3); correspond with team re dataroom to be downloaded (.1); review voluminous dataroom (.9); correspond with PH team re: same (.2)	1.60	515.00	824.00
11/29/2022	ML30	Monitor the docket (.1); review recent filings and update calendars and working group re: same (.1)	0.20	515.00	103.00
11/30/2022	ML30	Monitor the docket (.1); review recent filings and update calendars and work group re: same (.7)	0.80	515.00	412.00
<b>Subtotal: B113 Pleadings Review</b>			<b>13.20</b>		<b>10,824.00</b>

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2344665

Page 4

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>B155 Court Hearings</b>					
11/01/2022	AM50	Participate on calls with S. Clements and D. Fliman related to first day hearing for DLP IV (1.0); follow up review of same (0.2)	1.20	1,610.00	1,932.00
11/01/2022	DF9	Call with case parties re cash collateral hearing (1.1); review submissions to prepare for same (.6); correspond with client re same (.6); call with MB team re anticipated Akin objection (.4); outline response to same (.8)	3.50	1,610.00	5,635.00
11/01/2022	JI2	Review first days for Nov. 2 hearing	0.30	930.00	279.00
11/01/2022	JTG4	Call with D. Fliman and L. Chiappetta to discuss first day hearing prep.	0.70	1,585.00	1,109.50
11/01/2022	JDE	Review first day submissions in preparation for hearing (1.4); calls and conferences with PH team regarding same (1.1)	2.50	1,485.00	3,712.50
11/02/2022	AM50	Participate in first day hearing	2.00	1,610.00	3,220.00
11/02/2022	DF9	Participate in court hearings re cash collateral (2.0); review issues and notes to prepare for same (2.3); correspond with client re same (.4); correspond with PH team re same (.6)	5.30	1,610.00	8,533.00
11/02/2022	JI2	Review issues and notes to prepare for first day hearing (1.6); attend DLP IV first day hearing (2.0); discussion with PH team re same (.4)	4.00	930.00	3,720.00
11/02/2022	JG32	Attend DLP IV first day hearing	2.10	1,735.00	3,643.50
11/02/2022	JDE	Attend first day hearing (2.1); prepare for same (2.1)	4.20	1,485.00	6,237.00
11/02/2022	ML30	Monitor the first day hearing	1.90	515.00	978.50
11/14/2022	AM50	Review matters related to emergency conference with Bankruptcy Court (.3); listen to conference (.4); review order on same (.3)	1.00	1,610.00	1,610.00
11/14/2022	DF9	Participate in hearing re governance issues (.6); correspond with PH team and clients re same (1.1)	1.70	1,610.00	2,737.00

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2344665

Page 5

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/14/2022	JI2	Attend status conference (.9); review related order (.1); emails with PH team re same (.2)	1.20	930.00	1,116.00
11/14/2022	JG32	Attend status conference	0.80	1,735.00	1,388.00
11/14/2022	JDE	Prepare for (1.0) and attend emergency status conference (0.8); correspond and conference with Paul Hastings team and S. Clements regarding same (0.3)	2.10	1,485.00	3,118.50
11/14/2022	MM57	Observe hearing (.4); calendar subsequent hearing (.1)	0.50	515.00	257.50
11/30/2022	JTG4	Review court calendar for upcoming hearings	0.20	1,585.00	317.00
<b>Subtotal: B155 Court Hearings</b>			<b>35.20</b>		<b>49,544.00</b>

**B160 Fee/Employment Applications**

11/01/2022	JI2	Draft Paul Hastings retention application (3.4); review disclosures for supporting declaration (.4)	3.80	930.00	3,534.00
11/03/2022	DF9	Review and comment on PH retention matters	0.80	1,610.00	1,288.00
11/03/2022	JI2	Draft retention application (4.6); draft engagement letter (1.3); draft firm-wide email re retention disclosures (.9); emails with D. Hein re same (.3); analysis re same (.3)	7.40	930.00	6,882.00
11/03/2022	KAT2	Review and mark up draft retention papers (2.1); correspond with J. Iaffaldano regarding same (.1)	2.20	920.00	2,024.00
11/07/2022	JI2	Review research related to with retention application	3.40	930.00	3,162.00
11/07/2022	ML30	Correspond with J. Iaffaldano re retention matter	0.20	515.00	103.00
11/08/2022	ML30	Correspond with J. Iaffaldano re retention matter (.2); review additional information regarding same (2.6); correspond with J. Iaffaldano regarding same (.2)	3.00	515.00	1,545.00

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2344665

Page 6

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/09/2022	JI2	Correspond with committee members regarding engagement letter	1.10	930.00	1,023.00
11/10/2022	JI2	Revise retention application	0.80	930.00	744.00
11/11/2022	JI2	Review and analyze conflicts research results in connection with retention application	1.60	930.00	1,488.00
11/11/2022	KAT2	Correspond with D. Hein regarding engagement (.1); correspond with J. Iaffaldano and C. Edge regarding professional compensation (.1); review issues regarding same (.2)	0.40	920.00	368.00
11/14/2022	JI2	Email client re engagement letter (.2); email J. Evans re retention application (.1)	0.30	930.00	279.00
11/15/2022	JI2	Review conflicts research results in connection with retention application.	1.10	930.00	1,023.00
11/15/2022	JDE	Review and revise Paul Hastings retention application.	2.20	1,485.00	3,267.00
11/15/2022	KAT2	Correspond with J. Iaffaldano regarding disclosures for retention application	0.20	920.00	184.00
11/18/2022	JI2	Prepare schedules regarding interested parties for PH retention application	0.90	930.00	837.00
11/21/2022	JI2	Draft parts of retention application.	2.10	930.00	1,953.00
11/22/2022	JI2	Prepare retention application.	3.70	930.00	3,441.00
11/23/2022	JTG4	Analyze issues related to retention application (.8); emails with J. Goldstein about same (.4)	1.20	1,585.00	1,902.00
11/27/2022	JI2	Review professional fee matters	0.70	930.00	651.00
11/28/2022	AM50	Review and comment on engagement letter	0.30	1,610.00	483.00
11/28/2022	JI2	Review and revise PH retention application, supporting declarations, and proposed order	3.10	930.00	2,883.00
11/29/2022	JI2	Prepare parts of retention application	0.60	930.00	558.00
11/29/2022	JTG4	Review and revise PH retention application (1.4); emails with J. Iaffaldano about same (.4)	1.80	1,585.00	2,853.00
11/30/2022	AM50	Review and comment on retention matters	1.00	1,610.00	1,610.00

Conflicts Committee of GWG DLP Funding IV, LLC  
 51132-00002  
 Invoice No. 2344665

Page 7

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/30/2022	DF9	Revise PH retention application (1.7); review and comment on filing of same (.4)	2.10	1,610.00	3,381.00
11/30/2022	JTG4	Emails with J. Iaffaldano and D. Fliman about PH retention application	0.90	1,585.00	1,426.50
11/30/2022	KAT2	Call with J. Iaffaldano regarding retention questions (.2); review local rules and complex case procedures related to same (.1)	0.30	920.00	276.00
11/30/2022	MM57	Correspond with J. Iaffaldano re: PH retention application (.1); review same (.5); correspond with working group re: same (.1); e-file same (.1)	0.80	515.00	412.00
<b>Subtotal: B160 Fee/Employment Applications</b>			<b>48.00</b>		<b>49,580.50</b>

**B230 Financing/Cash Collections**

11/02/2022	DF9	Review proposed language re use of cash collateral and correspond with case parties re same	0.80	1,610.00	1,288.00
11/02/2022	J12	Review objection to cash collateral order	1.40	930.00	1,302.00
11/02/2022	JG32	Revise cash collateral order (.6); telephone conference with S. Clements regarding same (.5)	1.10	1,735.00	1,908.50
11/02/2022	JDE	Review and revise cash collateral order (1.6); correspond with PH team regarding same (.5); conference with PH team regarding same (.7)	2.80	1,485.00	4,158.00
11/03/2022	DF9	Call with W&C re cash collateral.	0.50	1,610.00	805.00
11/03/2022	JG32	Finalize cash collateral order	0.80	1,735.00	1,388.00
11/19/2022	DF9	Call with W&C team re case developments, DIP (.6); correspond with PH team re same and outline related analysis (.4)	1.00	1,610.00	1,610.00
11/19/2022	J12	Call with S. Clements regarding DIP issues (1.2); emails with PH team regarding same (.6); email S. Clements re same (.2)	2.00	930.00	1,860.00

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2344665

Page 8

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/21/2022	DF9	Correspond with W&C team re DIP matters (.3); analyze same (.6); correspond with PH team re related issues/tasks (.2)	1.10	1,610.00	1,771.00
11/22/2022	JG32	Correspond with W&C regarding DIP matters	0.40	1,735.00	694.00
<b>Subtotal: B230 Financing/Cash Collections</b>			<b>11.90</b>		<b>16,784.50</b>

**B260 Board of Directors Matters**

11/01/2022	AM50	Research and analysis regarding board matters (2.2); telephone call with S. Clements on same (0.4)	2.60	1,610.00	4,186.00
11/02/2022	AM50	Update calls with Mintz & Gold and PH team regarding board matters (.5); review and comment on cash collateral order language related to fiduciary duties for DLP IV Board (.7)	1.20	1,610.00	1,932.00
11/02/2022	J12	Review board resolutions of GWG Life and GWG Holdings (.3); email D. Fliman re same (.1)	0.40	930.00	372.00
11/08/2022	JG32	Review deck for S. Clements in preparation for conflicts committee meeting	2.10	1,735.00	3,643.50
11/09/2022	AM50	Attend conflicts committee meeting (.5); follow up analysis regarding same (.5)	1.00	1,610.00	1,610.00
11/09/2022	DF9	Attend conflicts committee meeting	0.50	1,610.00	805.00
11/09/2022	J12	Attend conflicts committee meeting (.5); prepare minutes for same (2.2); follow up analysis re same (.7)	3.40	930.00	3,162.00
11/09/2022	JG32	Conflicts committee meeting attendance	0.60	1,735.00	1,041.00
11/11/2022	JG32	Participate in conflicts committee telephone conference	0.40	1,735.00	694.00
11/16/2022	DF9	Attend Board update call (.5); follow up review of related matters (.5)	1.00	1,610.00	1,610.00
11/18/2022	AM50	Participate on update call with conflicts committee members and Mayer Brown	0.50	1,610.00	805.00



Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2344665

Page 9

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/18/2022	JDE	Attend DLP IV Board call (1.0); correspond with Paul Hastings with respect to same (0.2)	1.20	1,485.00	1,782.00
11/19/2022	JDE	Call with S. Clements and Paul Hastings team regarding DLP IV board meeting.	0.70	1,485.00	1,039.50
11/23/2022	AM50	Participate on conflicts committee call	0.50	1,610.00	805.00
11/23/2022	DF9	Meeting with DLP IV board re updates (.5); meeting with DLP IV conflicts committee re same (.5); correspond with A. Miller and J. Evans re board meeting (.4); assess board tasks, approvals (.6)	2.00	1,610.00	3,220.00
11/23/2022	JG32	Review and comment on GWG case and board issues	0.70	1,735.00	1,214.50
11/23/2022	JDE	Prepare for (.2) and attend board call (.5); attend call with conflicts committee (.5)	1.20	1,485.00	1,782.00
11/29/2022	JG32	Review case status (.6); correspond with S. Clements regarding same (.7 )	1.30	1,735.00	2,255.50
11/30/2022	DF9	Participate in DLP IV board meeting.	0.50	1,610.00	805.00
11/30/2022	JDE	Prepare for and attend board call	0.50	1,485.00	742.50
<b>Subtotal: B260 Board of Directors Matters</b>			<b>22.30</b>		<b>33,506.50</b>

**B261 Investigations**

11/01/2022	DF9	Outline investigation tasks, timing.	0.80	1,610.00	1,288.00
11/02/2022	AM50	Follow up correspondence with PH team on work plan & next steps	1.00	1,610.00	1,610.00
11/02/2022	DF9	Outline tasks re investigation with PH team.	0.90	1,610.00	1,449.00
11/03/2022	AM50	Review and comment on conflicts committee engagement letter and work plan (1.5); participate on calls with W&C regarding conflicts committee (.7); correspond with PH team on work plan and analysis of case issues (1.3)	3.50	1,610.00	5,635.00
11/03/2022	DF9	Outline investigation issues/tasks (.9); conference with PH team re investigation (.8)	1.70	1,610.00	2,737.00

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2344665

Page 10

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/03/2022	JDE	Review and comment on diligence list (1.1); meetings with PH team regarding same, next steps (.9)	2.00	1,485.00	2,970.00
11/03/2022	MG21	Discussion with D. Fliman regarding Beal investigation (.7); review lender presentation regarding same (1.3); correspond with PH team regarding document request in connection with review (.3); correspond with M. Begun regarding review (.2)	2.50	1,200.00	3,000.00
11/03/2022	MIZ	Review DLP IV credit agreement, first day filings and additional information (2.8); correspond with M. Grabis and J. Iaffaldano regarding same (0.7)	3.50	1,410.00	4,935.00
11/03/2022	SL32	Review and revise lien and IP search chart for GWG DLP Funding IV, LLC	0.50	565.00	282.50
11/04/2022	AM50	Participate on introductory call with Katten (.6); review work plan and case issue analysis (1.0); correspond with PH team regarding same (.2)	1.80	1,610.00	2,898.00
11/04/2022	DF9	Call with Katten team re investigation (.5); outline issues/tasks and strategy for same (.6); correspond with PH team re same (.4); review and comment on related issues (.5); review draft diligence list (.4)	2.40	1,610.00	3,864.00
11/04/2022	J12	Draft committee priority document requests (5.3); correspond with J. Evans re same (.8); correspond with M. Grabis and M. Begun re document requests related to finance issues (.7); revise document requests in connection with same (1.1); email Debtors' counsel re document requests (.1)	8.00	930.00	7,440.00
11/04/2022	JDE	Review and comment on diligence list (1.2); prepare for and attend W&C call regarding diligence and investigation (1.3)	2.50	1,485.00	3,712.50
11/04/2022	MG21	Correspond with PH team regarding document request (.2); review related list of diligence requests (.3)	0.50	1,200.00	600.00

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2344665

Page 11

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/04/2022	MIZ	Review data room and revise priority request list (2.0); review and comment on letter regarding document request list (0.5); related correspondence with J. Iaffaldano and J. Evans (0.5)	3.00	1,410.00	4,230.00
11/04/2022	SL32	Review and revise lien summary chart	0.50	565.00	282.50
11/05/2022	JI2	Prepare action plan re conflicts committee investigation.	3.70	930.00	3,441.00
11/06/2022	JDE	Review and revise investigation work plan (.7); correspond with J. Iaffaldano regarding same (.3)	1.00	1,485.00	1,485.00
11/07/2022	AM50	Participate on call with S. Clements regarding conflicts committee update (.5); up review of issues (.2); conduct analysis regarding Beal prepetition transactions (1.5)	2.20	1,610.00	3,542.00
11/07/2022	DF9	Correspond with PH team re issues/task list for investigation.	0.80	1,610.00	1,288.00
11/07/2022	SL32	Review lien searches for GWG DLP Funding IV, LLC	0.50	565.00	282.50
11/08/2022	AM50	Review work plan for investigation (1.0); provide comments on same (.6); review issues and notes to prepare for meeting with S. Clements (1.2); review and comment on diligence requests (.8)	3.60	1,610.00	5,796.00
11/08/2022	DF9	Evaluate investigation issues and related tasks.	0.50	1,610.00	805.00
11/09/2022	AM50	Review submissions and notes to prepare for S. Clements meeting (1.0); participate in meeting with S. Clements regarding conflicts committee investigation (2.7); discussions with Mintz & Gold regarding diligence requests (.5)	4.20	1,610.00	6,762.00
11/09/2022	DF9	Conference with S. Clements re investigation issues/tasks (1.0); outline same (.8); correspond with PH team re same (.8)	2.60	1,610.00	4,186.00
11/09/2022	JI2	Correspond with Mayer Brown regarding document requests	0.40	930.00	372.00

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2344665

Page 12

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/10/2022	DF9	Review and comment on documents needed and related tasks for investigation.	0.90	1,610.00	1,449.00
11/10/2022	J12	Emails with C. Herrera (Mayer Brown) re document requests and production (.7); follow up call with C. Herrera re same (.3); emails with PH team re same (.3)	1.30	930.00	1,209.00
11/10/2022	ML30	Correspond with J. Iaffaldano re dataroom preparation (.1); monitor same for documents to be populated (.1)	0.20	515.00	103.00
11/11/2022	AM50	Follow up conflicts committee investigation and analysis (2.0); participate on calls with S. Clements and D. Fliman regarding same (1.2)	3.20	1,610.00	5,152.00
11/11/2022	DF9	Call with Akin team re investigation (.5); call with PH team re investigation issues/tasks, next steps (1.1); review and comment on interview and document needs (1.1)	2.70	1,610.00	4,347.00
11/11/2022	JG32	Review and comment on discovery issues	0.40	1,735.00	694.00
11/11/2022	JDE	Attend telephone conference with Akin regarding investigation (.5); attend telephone conference with Paul Hastings team regarding next steps in investigation (1.1); review and analyze bondholder committee discovery requests (0.5)	2.10	1,485.00	3,118.50
11/14/2022	AM50	Participate on call with W&C regarding DLP IV investigation (.5); analysis on same (1.0)	1.50	1,610.00	2,415.00
11/14/2022	DF9	Call with W&C team re investigation of Beal.	0.50	1,610.00	805.00
11/14/2022	J12	Call with L. Miliotes and J. Evans re investigation issues (.5); follow up call with L. Miliotes re same (.2); review notes re investigation issues in preparation for same (.2); correspond with J. Evans re same (.4)	1.40	930.00	1,302.00
11/14/2022	JG32	Correspond with client regarding case/investigation update	0.40	1,735.00	694.00

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2344665

Page 13

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/14/2022	JDE	Meetings with Paul Hastings team regarding investigation and next steps (0.5); telephone conference with Paul Hastings and White & Case teams regarding investigation (0.5)	1.00	1,485.00	1,485.00
11/14/2022	LM20	Analyze investigation matters (.8); follow up call with J. Iaffaldano regarding same (.2); call with J. Iaffaldano and J. Evans re investigation issues (.5)	1.50	755.00	1,132.50
11/15/2022	AM50	Review protective order as it relates to DLP IV conflicts committee (.7); discuss same with D. Fliman (.3); review issues and notes to prepare for meeting with Beal Bank (1.2)	2.20	1,610.00	3,542.00
11/15/2022	DF9	Review and comment on Beal interview matters (.4); outline related issues and preparatory tasks (.6)	1.00	1,610.00	1,610.00
11/15/2022	JG32	Correspond with Conflicts Committee regarding investigation (.4); review and comment on discovery issues (.3); review related documents (.4)	1.10	1,735.00	1,908.50
11/15/2022	LM20	Meet with J. Evans and J. Iaffaldano regarding investigation matters(.3); draft memorandum regarding same (1.8); research and analysis regarding investigation matters (3.2)	5.30	755.00	4,001.50
11/16/2022	AM50	Prepare outline for Beal Bank interview (1.3); review and comment on protective order (1.0); respond to emails from J. Evans on same (.3)	2.60	1,610.00	4,186.00
11/16/2022	DF9	Review document needs and related tasks for investigation (.6); review and comment on confidentiality terms (.6)	1.20	1,610.00	1,932.00
11/16/2022	J12	Review sealed exhibits filed by UCC (5.3); correspond with A. Miller regarding same (.2)	5.50	930.00	5,115.00
11/16/2022	JG32	Review status of court adjournment (.3); correspond with S. Clements regarding same (.4); review status of Committee and investigation (.4)	1.10	1,735.00	1,908.50

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2344665

Page 14

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/16/2022	LM20	Research and analysis regarding investigation matters (2.8); draft memorandum regarding same (1.4)	4.20	755.00	3,171.00
11/17/2022	AM50	Review issues and supplement outline for Beal Bank questions/interview (3.2); prepare internal documentation with respect to the same (2.8); research and analysis regarding investigation matters (.6)	6.60	1,610.00	10,626.00
11/17/2022	DF9	Evaluate documents with respect to Beal interview (2.1); revise outline for same (1.4); correspond with PH team re same (.8)	4.30	1,610.00	6,923.00
11/17/2022	JG32	Review and comment on discovery, DIP and main case issues (1.3)	1.30	1,735.00	2,255.50
11/17/2022	LM20	Research and analysis regarding investigation matters (3.0); draft memorandum regarding same (2.8)	5.80	755.00	4,379.00
11/18/2022	AM50	Review issues and outline to prepare for Beal Bank interview (2.2); participate in interview with Beal Bank (1.1); review and handle follow up matters related to Beal Bank interview (1.8)	5.10	1,610.00	8,211.00
11/18/2022	DF9	Prepare for and conduct interview of Beal representative (1.4); discuss same with PH team and S. Clements (.8); outline follow up investigation issues/tasks (.5)	2.70	1,610.00	4,347.00
11/18/2022	JG32	Discovery and case matter analysis (.7); telephone conference with S. Clements regarding updates on same (.5)	1.20	1,735.00	2,082.00
11/18/2022	JDE	Attend Beal Bank interview (0.8); attend Paul Hastings internal call post-Beal interview (0.6)	1.40	1,485.00	2,079.00
11/18/2022	LM20	Draft memorandum regarding certain investigation matters (1.9); call with J. Iaffaldano and J. Evans re same (1.3)	3.20	755.00	2,416.00
11/18/2022	ML30	Review notice re dataroom updates (.1); organize; correspond with J. Iaffaldano re: same (.1)	0.20	515.00	103.00

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2344665

Page 15

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/19/2022	AM50	Follow up correspondence with S. Clements and D. Fliman regarding Beal Bank interview and related matters.	1.00	1,610.00	1,610.00
11/21/2022	AM50	Follow up correspondence with PH team on outstanding diligence requests	0.40	1,610.00	644.00
11/21/2022	JG32	Review and comment on discovery matters	0.30	1,735.00	520.50
11/22/2022	AM50	Review and comment on ongoing diligence/discovery items	1.00	1,610.00	1,610.00
11/22/2022	DF9	Outline issues and related tasks with respect to investigation.	0.50	1,610.00	805.00
11/22/2022	JG32	Review and comment on investigation matters issues list (.3); correspond with PH team and S. Clements regarding same (.4)	0.70	1,735.00	1,214.50
11/22/2022	JDE	Correspond with PH and MB teams regarding document production.	0.30	1,485.00	445.50
11/23/2022	DF9	Review and comment on investigation issues and related tasks.	0.50	1,610.00	805.00
11/23/2022	JG32	Review and comment on discovery and settlement matters	0.70	1,735.00	1,214.50
11/28/2022	MM57	Correspond with vendor re: discovery (.1); correspond w/ J. Iaffaldano and M. Laskowski re: same (.1)	0.20	515.00	103.00
<b>Subtotal: B261 Investigations</b>			<b>133.30</b>		<b>178,567.00</b>

**B310 Claims Administration and Objections**

11/22/2022	AM50	Review and comment on recent developments related to potential settlement of Beal claims (1.0); discussions with D. Fliman on same (.3)	1.30	1,610.00	2,093.00
11/22/2022	DF9	Call with L. Chiappetta and G. King re potential resolution of Beal claims (.4); call with Beal counsel re same (.4); correspond with PH team re same (1.2); correspond with client re same (.5); correspond with Mintz re same (.4); outline related issues, tasks, consideration (1.1)	4.00	1,610.00	6,440.00

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2344665

Page 16

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/23/2022	AM50	Analyze matters related to proposed settlement	0.90	1,610.00	1,449.00
11/23/2022	DF9	Review issues re settlement of Beal claims (.6); correspond with case parties re same (.8); correspond with PH team re same (.4)	1.80	1,610.00	2,898.00
11/26/2022	DF9	Review and comment on pleadings re Beal settlement.	0.60	1,610.00	966.00
11/26/2022	JG32	Review and comment on Beal settlement matters (.8 ); correspond with client regarding same (.9); review and comment on Rule 9019 motion and term sheet (.5)	2.20	1,735.00	3,817.00
11/27/2022	DF9	Review comments re Beal settlement pleadings.	0.40	1,610.00	644.00
11/28/2022	AM50	Review and comment on Beal settlement discussions	0.40	1,610.00	644.00
11/28/2022	DF9	Review draft motion re resolution of Beal claims (.8); outline revisions to same (.5); correspond with case parties re same (.5); correspond with PH team re revisions to draft settlement motion (.8)	2.60	1,610.00	4,186.00
11/28/2022	JDE	Review and revise rule 9019 settlement motion (4.3); correspond and conference with PH team regarding same (0.5)	4.80	1,485.00	7,128.00
11/29/2022	AM50	Review and revise Rule 9019 motion regarding comprehensive settlement	1.40	1,610.00	2,254.00
11/29/2022	DF9	Review and revise Beal claims settlement (.9); correspond with PH team re same (.8)	1.70	1,610.00	2,737.00
11/29/2022	JG32	Review and comment on settlement documents and discovery issues (.5)	0.50	1,735.00	867.50
11/29/2022	JDE	Review and comment on rule 9019 motion (1.6); correspond with PH team, other case professionals regarding same (0.5)	2.10	1,485.00	3,118.50
11/30/2022	DF9	Review and comment on Beal claim settlement documents	0.40	1,610.00	644.00
11/30/2022	JG32	Review and comment on Rule 9019 issues (.9); review and analyze settlement matters (.8)	1.70	1,735.00	2,949.50



Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2344665

Page 17

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/30/2022	JDE	Review modifications to Rule 9019 motion (0.3); correspond and conference with PH team, other case professionals regarding same (1.2)	1.50	1,485.00	2,227.50
<b>Subtotal: B310 Claims Administration and Objections</b>			<b>28.30</b>		<b>45,063.00</b>
<b>B320 Plan and Disclosure Statement (including Business Plan)</b>					
11/30/2022	AM50	Review draft plan (.7); discussions with J. Evans on same (.7)	1.40	1,610.00	2,254.00
11/30/2022	DF9	Review and comment on plan revisions with PH team.	0.50	1,610.00	805.00
11/30/2022	JDE	Review and comment on plan	2.40	1,485.00	3,564.00
<b>Subtotal: B320 Plan and Disclosure Statement (including Business Plan)</b>			<b>4.30</b>		<b>6,623.00</b>
<b>Total</b>			<b>302.60</b>		<b>397,585.00</b>

**Timekeeper Summary**

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
JG32	Jayme Goldstein	Partner	27.90	1,735.00	48,406.50
AM50	Allison Miller	Partner	57.20	1,610.00	92,092.00
DF9	Dan Fliman	Partner	56.80	1,610.00	91,448.00
JTG4	James T. Grogan	Partner	4.80	1,585.00	7,608.00
JDE	Jeremy D. Evans	Of Counsel	38.50	1,485.00	57,172.50
MIZ	Marina I. Begun	Of Counsel	6.50	1,410.00	9,165.00
KAT2	Katherine A. Traxler	Of Counsel	3.10	920.00	2,852.00
MG21	Maria Grabis	Associate	3.00	1,200.00	3,600.00
JI2	Jack Iaffaldano	Associate	63.60	930.00	59,148.00
LM20	Lanie Miliotes	Associate	20.00	755.00	15,100.00
SL32	Sandy Lee	Paralegal	1.50	565.00	847.50

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2344665

Page 18

ML30	Mat Laskowski	Paralegal	17.90	515.00	9,218.50
MM57	Michael Magzamen	Paralegal	1.80	515.00	927.00

**Costs incurred and advanced**

<u>Date</u>	<u>Description</u>	<u>Quantity</u>	<u>Rate</u>	<u>Amount</u>
11/09/2022	Photocopy Charges	376.00	0.08	30.08
11/16/2022	Photocopy Charges	1,860.00	0.08	148.80
11/02/2022	Computer Search (Other)			6.30
11/03/2022	Local - Meals - Grubhub Holdings Inc. f/k/a Seamlessweb (USD) (JPMSUA); Invoice # SL-190-54 dated 11/6/2022; Jack laffaldano; Restaurant: House of Lasagna; Dinner; Number of people: 1; Location: Washington, D.C.; Work meal expense.; Order # 57202059488867 dated 11/03/2022			36.58
11/07/2022	CSC/LexisNexis Document Solutions - Requested by Sandy Lee; Corporation Service Company (USD)(JPMSUA); Invoice # 86113426763 dated 2022-11-07; Gwg Dlp Funding IV, Llc Search TX Service Fee - Litigation Search			127.20
11/07/2022	CSC/LexisNexis Document Solutions - Requested by Sandy Lee; Corporation Service Company (USD)(JPMSUA); Invoice # 86113426763 dated 2022-11-07; Gwg Dlp Funding IV, Llc Search DE Service Fee - Litigation Search			127.20
11/07/2022	CSC/LexisNexis Document Solutions - Requested by Sandy Lee; Corporation Service Company (USD)(JPMSUA); Invoice # 86113426763 dated 2022-11-07; Gwg Dlp Funding IV, Llc Search DE Service Fee - Judgment Search			127.20
11/07/2022	CSC/LexisNexis Document Solutions - Requested by Sandy Lee; Corporation Service Company (USD)(JPMSUA); Invoice # 86113426763 dated 2022-11-07; Gwg Dlp Funding IV, Llc Search TX Service Fee - Judgment Search			169.60

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2344665

Page 19

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11/07/2022	CSC/LexisNexis Document Solutions - Requested by Sandy Lee; Corporation Service Company (USD)(JPMSUA); Invoice # 86113426763 dated 2022-11-07; Gwg Dlp Funding IV, Llc Search DE Disbursement/cost	173.00
11/07/2022	CSC/LexisNexis Document Solutions - Requested by Sandy Lee; Corporation Service Company (USD)(JPMSUA); Invoice # 86113427601 dated 2022-11-07; Gwg Dlp Funding IV, Llc US Service Fee-Copyright Portfolio Name Srch-2da	325.00
11/07/2022	CSC/LexisNexis Document Solutions - Requested by Sandy Lee; Corporation Service Company (USD)(JPMSUA); Invoice # 86113426763 dated 2022-11-07; Gwg Dlp Funding IV, Llc Search TX Service Fee - Ucc Search State Level	42.40
11/07/2022	CSC/LexisNexis Document Solutions - Requested by Sandy Lee; Corporation Service Company (USD)(JPMSUA); Invoice # 86113426763 dated 2022-11-07; Gwg Dlp Funding IV, Llc Search TX Service Fee - Ucc Search - County Level	42.40
11/07/2022	CSC/LexisNexis Document Solutions - Requested by Sandy Lee; Corporation Service Company (USD)(JPMSUA); Invoice # 86113426763 dated 2022-11-07; Gwg Dlp Funding IV, Llc Search TX Service Fee - Bankruptcy Search	42.40
11/07/2022	CSC/LexisNexis Document Solutions - Requested by Sandy Lee; Corporation Service Company (USD)(JPMSUA); Invoice # 86113426763 dated 2022-11-07; Gwg Dlp Funding IV, Llc Search DE Service Fee - Bankruptcy Search	42.40
11/07/2022	CSC/LexisNexis Document Solutions - Requested by Sandy Lee; Corporation Service Company (USD)(JPMSUA); Invoice # 86113426763 dated 2022-11-07; Gwg Dlp Funding IV, Llc Search DE Service Fee - Ucc Search - County Level	42.40
11/07/2022	CSC/LexisNexis Document Solutions - Requested by Sandy Lee; Corporation Service Company (USD)(JPMSUA); Invoice # 86113426763 dated 2022-11-07; Gwg Dlp Funding IV, Llc Search TX Service Fee - Tax Search	42.40

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2344665

Page 20

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11/07/2022	CSC/LexisNexis Document Solutions - Requested by Sandy Lee; Corporation Service Company (USD)(JPMSUA); Invoice # 86113426763 dated 2022-11-07; Gwg Dlp Funding IV, Llc Search DE Service Fee - Ucc Search State Level	42.40
11/07/2022	CSC/LexisNexis Document Solutions - Requested by Sandy Lee; Corporation Service Company (USD)(JPMSUA); Invoice # 86113427585 dated 2022-11-07; Gwg Dlp Funding IV, Llc US Service Fee-Trademark Ownership Search-2 Day	440.00
11/07/2022	CSC/LexisNexis Document Solutions - Requested by Sandy Lee; Corporation Service Company (USD)(JPMSUA); Invoice # 86113426763 dated 2022-11-07; Gwg Dlp Funding IV, Llc Search DE Special Handling Fee - Expedited Lien/litigat	50.00
11/07/2022	CSC/LexisNexis Document Solutions - Requested by Sandy Lee; Corporation Service Company (USD)(JPMSUA); Invoice # 86113427620 dated 2022-11-07; Gwg Dlp Funding IV, Llc US Service Fee-Patent Ownership Search-2 Day Ser	535.00
11/07/2022	CSC/LexisNexis Document Solutions - Requested by Sandy Lee; Corporation Service Company (USD)(JPMSUA); Invoice # 86113426763 dated 2022-11-07; Gwg Dlp Funding IV, Llc Search TX Special Handling Fee - Expedited Lien/litigat	75.00
11/07/2022	CSC/LexisNexis Document Solutions - Requested by Sandy Lee; Corporation Service Company (USD)(JPMSUA); Invoice # 86113426763 dated 2022-11-07; Gwg Dlp Funding IV, Llc Search TX Disbursement/cost	76.00
11/07/2022	CSC/LexisNexis Document Solutions - Requested by Sandy Lee; Corporation Service Company (USD)(JPMSUA); Invoice # 86113426763 dated 2022-11-07; Gwg Dlp Funding IV, Llc Search DE County/court Disbursement/cost	84.00
11/07/2022	CSC/LexisNexis Document Solutions - Requested by Sandy Lee; Corporation Service Company (USD)(JPMSUA); Invoice # 86113426763 dated 2022-11-07; Gwg Dlp Funding IV, Llc Search TX County/court Disbursement/cost	84.00

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2344665

Page 21

11/07/2022	CSC/LexisNexis Document Solutions - Requested by Sandy Lee; Corporation Service Company (USD)(JPMSUA); Invoice # 86113426763 dated 2022-11-07; Gwg Dlp Funding IV, Llc Search DE Service Fee - Tax Search	84.80
11/08/2022	Local - Meals - Grubhub Holdings Inc. f/k/a Seamlessweb (USD) (JPMSUA); Invoice # SL-190-55 dated 11/20/2022; NY Reception; Location: Washington, D.C.; Ordered by C. Pickens on behalf of T. Garcia. NY 6 person snack (Sherwood) for Conflicts Meeting in 26-150 Verrazano. C/M: 51132-00002 meeting date 11/9/22.; Order # 905920646350250 dated 11/08/2022	63.76
11/11/2022	Local - Meals - Jayme Goldstein; 10/30/2022; Restaurant: Heartland; City: New York; Lunch; Number of people: 1; work meal expense; Jayme Goldstein	32.30
11/15/2022	Local - Taxi - Jayme Goldstein; 11/02/2022; From/To: office/home; Service Type: Uber; taxi expense for car ride home from late-night work	52.87
11/15/2022	Local - Taxi - Jayme Goldstein; 11/01/2022; From/To: office/home; Service Type: Uber; taxi expense for car ride home from late-night work	89.81
11/18/2022	Westlaw	24.86
<b>Total Costs incurred and advanced</b>		<b>\$3,260.16</b>
<b>Current Fees and Costs</b>		<b>\$400,845.16</b>
<b>Total Balance Due - Due Upon Receipt</b>		<b>\$400,845.16</b>

**UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:	)	
	)	Chapter 11
	)	
GWG Holdings, Inc., <i>et al.</i> , <sup>1</sup>	)	Case No. 22-90032 (MI)
	)	
Debtors.	)	(Jointly Administered)
	)	

**NOTICE OF SECOND MONTHLY FEE STATEMENT OF PAUL HASTINGS LLP,  
COUNSEL TO SEAN CLEMENTS AND THE CONFLICTS COMMITTEE OF THE  
BOARD OF DIRECTORS OF GWG DLP FUNDING IV, LLC FOR THE PERIOD  
FROM DECEMBER 1, 2022 THROUGH DECEMBER 31, 2022**

Name of applicant:	Paul Hastings LLP	
Applicant’s Role in the Case:	Attorneys to Sean Clements and the Conflicts Committee of the board of directors of GWG DLP Funding IV, LLC (“ <u>DLP IV</u> ”)	
Date Order of Employment Signed and Docket No.:	January 6, 2023 (effective as of October 31, 2022) [Docket No. 1325]	
	Beginning Date	End Date
Time period covered by this Statement:	12/1/2022	12/31/2022
Summary of Total Fees and Expenses Requested		
Total fees requested in this Statement:	\$65,204.40 (80% of \$81,505.50)	
Total expenses requested in this Statement:	\$198.68	
Total fees and expenses requested in this Statement (excluding 20% holdback):	\$81,704.18	
Total fees and expenses requested in this Statement (including 20% holdback):	\$65,403.08	
Summary of Attorney Fees Requested		
Total attorney fees requested in this Statement:	\$75,892.00	

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: GWG Holdings, Inc. (2607); GWG Life, LLC (6955); GWG Life USA, LLC (5538), GWG DLP Funding IV, LLC (2589); GWG DLP Funding VI, LLC (6955); and GWG DLP Funding Holdings VI, LLC (6955). The location of Debtor GWG Holdings, Inc.'s principal place of business and the Debtors' service address is 325 N. St. Paul Street, Suite 2650 Dallas, TX 75201. Further information regarding the Debtors and these chapter 11 cases is available at the website of the Debtors' claims and noticing agent: <https://donlinrecano.com/gwg>.

Total actual attorney hours covered by this Statement:	51.60
Average hourly rate for attorneys:	\$1,471
Summary of Paraprofessional Fees Requested	
Total paraprofessional fees requested in this Statement:	\$5,613.50
Total actual paraprofessional hours covered by this Statement:	10.90
Average hourly rate for paraprofessionals:	\$515

In accordance with the *Corrected Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and (II) Granting Related Relief* [Docket No. 378] (the “Interim Compensation Order”),<sup>2</sup> Paul Hastings LLP (“Paul Hastings”) respectfully submits this second monthly statement (the “Monthly Statement”) and requests payment for services rendered and reimbursement of expenses incurred as counsel to Sean Clements and the Conflicts Committee of the board of directors of DLP IV in the above-captioned chapter 11 cases for the period from December 1, 2022 through and including December 31, 2022 (the “Fee Period”) in the amounts set forth above.

### **SERVICES RENDERED AND EXPENSES INCURRED**

1. Attached hereto as **Exhibit A** is a timekeeper summary that includes the name, title, department, bar admission, hourly billing rate, aggregate hours, and amount of fees earned for each Paul Hastings individual who provided services during the Fee Period.

2. Attached hereto as **Exhibit B** is a summary of Paul Hastings’ services rendered and compensation sought, by project category, for the Fee Period.

3. Attached hereto as **Exhibit C** is a summary of expenses incurred and reimbursement sought, by expense type, for the Fee Period.

4. Attached hereto as **Exhibit D** are the fee statements of Paul Hastings for services provided during the Fee Period.

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Interim Compensation Order.

### **NOTICE AND OBJECTION PROCEDURES**

5. Notice of this Monthly Statement will be given to the following parties (collectively, the “Application Recipients”): (i) the Debtors c/o GWG Holdings, Inc., 325 N. St. Paul St., Suite 2650, Dallas, TX 75201, Attn: Timothy Evans; (ii) counsel to the Debtors, Mayer Brown LLP, 71 S. Wacker Drive, Chicago, IL 60606, Attn: Thomas S. Kiriakos; (iii) co-counsel to the Debtors, Jackson Walker LLP, 1401 McKinney Street, Suite 1900, Houston, TX 77010, Attn: Kristhy M. Peguero and Matthew D. Cavanaugh; (iv) counsel to the DIP Lender, Sidley Austin LLP, One South Dearborn, Chicago, IL 60603, Attn: Matthew A. Clemente; (v) counsel to Bank of Utah in its capacity as indenture trustee for the Bonds, Akin Gump Strauss Hauer & Feld LLP, 2001 K Street NW, Washington, D.C., 20006-1037, Attn: Scott Alberino; (vi) counsel to any statutory committee appointed in these cases; and (vii) the Office of the U.S. Trustee for the Southern District of Texas, 515 Rusk Street, Suite 3516, Houston, TX 77002, Attn: Hector Duran.

6. Objections to this Monthly Statement, if any, must be served upon the Application Recipients and the undersigned counsel by or before 4:00 p.m. (CT) on the fourteenth day after service of this Monthly Statement (the “Objection Deadline”), setting forth with specificity the objectionable fees or expenses, the amount of the disputed fees or expenses, and the basis for such objection. If no objections are received by the Objection Deadline, the Debtors shall promptly pay Paul Hastings 80 percent of the fees and 100 percent of the expenses identified in this Monthly Statement.

7. To the extent that an objection to this Monthly Statement is received on or before the Objection Deadline, the Debtors shall withhold payment of that portion of this Monthly Statement to which the objection is directed and promptly pay the remainder of the fees and expenses in the percentages set forth above. To the extent such objection is not resolved,



pursuant to the procedures set forth in the Interim Compensation Order, the objecting party shall file its objection with the Court and serve the objection on the Application Recipients and the undersigned counsel. Thereafter, Paul Hastings may either (a) file with the Court a response to the objection together with a request for payment of the appropriate portion of the disputed amount or (b) preserve and schedule the disputed amount for consideration at the next interim or final fee application hearing.

8. To the extent that time or disbursement charges for services rendered or disbursements incurred relate to the Fee Period, but were not processed before the preparation of this Monthly Statement, or Paul Hastings has for any other reason not sought compensation or reimbursement with respect to such services or expenses, Paul Hastings reserves the right to request additional compensation for such services, and reimbursement of such expenses, in a supplemental or future statement.

*[Remainder of page intentionally left blank]*

Dated: January 13, 2023  
Houston, Texas

Respectfully submitted,

/s/ James T. Grogan III

**PAUL HASTINGS LLP**

James T. Grogan III (TX Bar No. 24027354)  
600 Travis Street, 58th Floor  
Houston, Texas 77002  
Telephone: (713) 860-7300  
Facsimile: (713) 353-3100  
Email: jamesgrogan@paulhastings.com

-and-

Jayme T. Goldstein (admitted *pro hac vice*)  
Daniel A. Fliman (admitted *pro hac vice*)  
Allison Miller (admitted *pro hac vice*)  
Jeremy D. Evans (admitted *pro hac vice*)  
John F. Iaffaldano (admitted *pro hac vice*)  
200 Park Avenue  
New York, New York 10166  
Telephone: (212) 318-6000  
Facsimile: (212) 319-4090  
Email: jaymegoldstein@paulhastings.com

*Counsel to Sean Clements and the Conflicts Committee of  
the board of directors of DLP IV*

**Exhibit A**

**COMPENSATION BY PROFESSIONAL AND PARAPROFESSIONAL FOR FEE PERIOD**

				Total for Fee Period	
Name	Department or Group	Date of First Admission	Hourly Rate	Hours Billed	Amount
Fliman, Dan	Corporate	2003	1,610.00	9.40	\$15,134.00
Goldstein, Jayme	Corporate	2003	1,735.00	13.80	\$23,943.00
Grogan, James	Corporate	2000	1,585.00	10.60	\$16,801.00
Miller, Allison	Corporate	2004	1,610.00	1.70	\$2,737.00
<b>Total Partner:</b>				<b>35.50</b>	<b>\$58,615.00</b>
Evans, Jeremy	Corporate	2013	1,485.00	4.20	\$6,237.00
Traxler, Katherine	Corporate	1990	920.00	2.70	\$2,484.00
<b>Total Counsel:</b>				<b>6.90</b>	<b>\$8,721.00</b>
Iaffaldano, Jack	Corporate	2020	930.00	9.20	\$8,556.00
<b>Total Associate:</b>				9.20	\$8,556.00
Laskowski, Mat	Paralegal		515.00	9.90	\$5,098.50
Magzamen, Michel	Paralegal		515.00	1.00	\$515.00
<b>Total Paraprofessional:</b>				<b>10.90</b>	<b>\$5,613.50</b>
<b>Total:</b>				<b>62.50</b>	<b>\$81,505.50</b>

**Exhibit B**

**COMPENSATION BY PROJECT CATEGORY FOR FEE PERIOD**

U.S. Trustee Task Code and Project Category	Total for Fee Period	
	Total Hours	Total Fees
B113 Pleadings Review	14.80	\$17,007.00
B155 Court Hearings	18.60	\$24,711.00
B160 Employment / Fee Applications (Paul Hastings)	15.90	\$18,679.50
B260 Board of Directors Matters	6.10	\$8,949.50
B261 Investigations	7.10	\$12,158.50
<b>TOTAL</b>	<b>62.50</b>	<b>\$81,505.50</b>

**Exhibit C**

**EXPENSE SUMMARY FOR FEE PERIOD**

Category	Total for Fee Period
Computer Search	\$25.67
Meals	\$149.75
Taxi/Ground Transportation	\$23.26
<b>TOTAL</b>	<b>\$198.68</b>

**Exhibit D**

**FEE STATEMENTS FOR FEE PERIOD**



**PAUL HASTINGS LLP**  
200 Park Avenue, New York, NY 10166-3205  
t: +1.212.318.6000 | f: +1.212.319.4090 | [www.paulhastings.com](http://www.paulhastings.com)

Conflicts Committee of GWG DLP Funding IV, LLC January 12, 2023  
Suite 1200  
220 South Sixth Street  
Minneapolis, MN 55402

Please Refer to  
Invoice Number: 2344666

Attn: Sean Clements

PH LLP Tax ID No. 95-2209675

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## SUMMARY SHEET

### Bankruptcy Case

PH LLP Client/Matter # 51132-00002  
Jayme Goldstein

Legal fees for professional services for the period ending December 31, 2022	\$81,505.50
Costs incurred and advanced	198.68
<b>Current Fees and Costs Due</b>	<b>\$81,704.18</b>
<b>Total Balance Due - Due Upon Receipt</b>	<b>\$81,704.18</b>

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

**TO PROTECT AGAINST FRAUD**, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Teri Goffredo @ 213-683-5045 or via email @ [terigoffredo@paulhastings.com](mailto:terigoffredo@paulhastings.com) and requesting written and verbal confirmation.

### Wiring and ACH Instructions:

Citibank  
ABA # 322271724  
SWIFT Address: CITIUS33  
787 W. 5th Street  
Los Angeles, CA 90071  
Account Number: 206628380  
Account Name: Paul Hastings LLP

### Remittance Address:

Paul Hastings LLP  
Lockbox 4803  
PO Box 894803  
Los Angeles, CA 90189-4803

For wires, please reference the invoice, client and matter number(s) being paid  
For ACH payments, please use the CTX format and/or send any remittances to [cashepn@paulhastings.com](mailto:cashepn@paulhastings.com). This is a no-reply mailbox  
Please refer all questions to [billing@paulhastings.com](mailto:billing@paulhastings.com)



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Conflicts Committee of GWG DLP Funding IV, LLC January 12, 2023  
Suite 1200  
220 South Sixth Street  
Minneapolis, MN 55402

Please Refer to  
Invoice Number: 2344666

Attn: Sean Clements

PH LLP Tax ID No. 95-2209675

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### REMITTANCE COPY

#### **Bankruptcy Case**

PH LLP Client/Matter # 51132-00002  
Jayme Goldstein

Legal fees for professional services for the period ending December 31, 2022	\$81,505.50
Costs incurred and advanced	198.68
<b>Current Fees and Costs Due</b>	<b>\$81,704.18</b>
<b>Total Balance Due - Due Upon Receipt</b>	<b>\$81,704.18</b>

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Lockbox 4803  
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Please refer all questions to [billing@paulhastings.com](http://billing@paulhastings.com)





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Conflicts Committee of GWG DLP Funding IV, LLC January 12, 2023  
Suite 1200  
220 South Sixth Street  
Minneapolis, MN 55402

Please Refer to  
Invoice Number: 2344666

Attn: Sean Clements

PH LLP Tax ID No. 95-2209675

FOR PROFESSIONAL SERVICES RENDERED  
for the period ending December 31, 2022

**Bankruptcy Case** **\$81,505.50**

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>B113 Pleadings Review</b>					
12/01/2022	JG32	Pleading review	0.30	1,735.00	520.50
12/01/2022	ML30	Monitor the docket (.4); review recent filings and update calendars and working group re: same (.9)	1.30	515.00	669.50
12/02/2022	JTG4	Review recent pleadings	0.20	1,585.00	317.00
12/02/2022	ML30	Monitor the docket (.2); review recent filings and update calendars and working group re: same (.3)	0.50	515.00	257.50
12/04/2022	JG32	Chapter 11 pleading review and analysis	0.40	1,735.00	694.00
12/05/2022	JTG4	Review recent pleadings	0.20	1,585.00	317.00
12/05/2022	ML30	Monitor the docket (.1); review recent filings and update calendars and working group re: same (.1)	0.20	515.00	103.00
12/06/2022	JG32	Review recent pleadings	0.20	1,735.00	347.00
12/06/2022	ML30	Monitor the docket (.2); review recent filings and update working group re: same (.1)	0.30	515.00	154.50

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2344666

Page 2

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/07/2022	ML30	Monitor the docket (.1); review recent filings and update working group re: same (.1)	0.20	515.00	103.00
12/08/2022	ML30	Monitor the docket (.1); review recent filings and update working group re: same (.1)	0.20	515.00	103.00
12/09/2022	JTG4	Review recent pleadings	0.20	1,585.00	317.00
12/09/2022	ML30	Monitor the docket (.1); review recent filings and update working group re: same (.1)	0.20	515.00	103.00
12/12/2022	JTG4	Review recent pleadings	0.20	1,585.00	317.00
12/12/2022	ML30	Monitor the docket (.1); review recent filings and update working group re: same (.1)	0.20	515.00	103.00
12/13/2022	ML30	Monitor the docket (.1); review recent filings and update working group re: same (.1)	0.20	515.00	103.00
12/14/2022	JTG4	Review recent pleadings	0.40	1,585.00	634.00
12/14/2022	JG32	Review chapter 11 filings; (.7) correspond with internal team regarding same and case and matter update (.4)	1.10	1,735.00	1,908.50
12/14/2022	ML30	Monitor the docket (.1); review recent filings and update calendars and working group re: same (.2)	0.30	515.00	154.50
12/15/2022	JTG4	Review recent pleadings and standing motion	0.50	1,585.00	792.50
12/15/2022	ML30	Monitor the docket (.5); review recent filings and update calendars and working group re: same (.3)	0.80	515.00	412.00
12/16/2022	JG32	Review and comment on chapter 11 case (GWG) pleadings	1.30	1,735.00	2,255.50
12/16/2022	ML30	Monitor the docket (.1); review recent filings and update working group re: same (.2)	0.30	515.00	154.50
12/19/2022	ML30	Monitor the docket (.1); review recent filings and update working group re: same (.1)	0.20	515.00	103.00

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2344666

Page 3

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/20/2022	JG32	Review case matters (.6)	0.60	1,735.00	1,041.00
12/20/2022	ML30	Monitor the docket (.2); review recent filings and update working group re: same (.1)	0.30	515.00	154.50
12/21/2022	JTG4	Review recent pleadings	0.30	1,585.00	475.50
12/21/2022	ML30	Monitor the docket (.1); review recent filings and update working group re: same (.1)	0.20	515.00	103.00
12/22/2022	JTG4	Review recently filed pleadings	0.30	1,585.00	475.50
12/22/2022	JG32	Review recent pleadings	0.80	1,735.00	1,388.00
12/22/2022	ML30	Monitor the docket (.2); review recent filings and update working group re: same (.2)	0.40	515.00	206.00
12/23/2022	JG32	Review recent pleadings	0.80	1,735.00	1,388.00
12/23/2022	ML30	Monitor the docket (.1); review recent filings and update calendars and working group re: same (.1)	0.20	515.00	103.00
12/27/2022	ML30	Monitor the docket (.1); review recent filings and update working group re: same (.1)	0.20	515.00	103.00
12/28/2022	JTG4	Review recent pleadings	0.20	1,585.00	317.00
12/28/2022	ML30	Monitor the docket (.1); prepare end of day update for working group re: recent filings (.1)	0.20	515.00	103.00
12/29/2022	ML30	Monitor the docket (.1); review recent filings and prepare end of day update for working group re: same (.1)	0.20	515.00	103.00
12/30/2022	ML30	Monitor the docket (.1); review recent filings and prepare end of day update for working group re: same (.1)	0.20	515.00	103.00
<b>Subtotal: B113 Pleadings Review</b>			<b>14.80</b>		<b>17,007.00</b>

**B155 Court Hearings**

12/01/2022	AM50	Participate in hearing on settlement (.5); review documents related to same (.7)	1.20	1,610.00	1,932.00
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Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2344666

Page 4

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/01/2022	DF9	Prepare for (.9) and participate in hearing re governance, resolution with Beal (2.9); discussion with internal team re same (.4); correspond with client re same (.4)	4.60	1,610.00	7,406.00
12/01/2022	J12	Attend hearing (2.8); correspond with client re same (.3); discussion with internal team re same (.2)	3.30	930.00	3,069.00
12/01/2022	JTG4	Correspond with J. Evans about hearing on DIP financing and lender settlements (.4); prepare for (.9) and attend hearing on DIP financing and lender settlements (2.9)	4.20	1,585.00	6,657.00
12/01/2022	JG32	Prepare Rule 9019 hearing summary and analysis (.3); correspond with client regarding same (.4)	0.70	1,735.00	1,214.50
12/01/2022	JDE	Review submissions and notes to prepare for Rule 9019/DIP hearing (.9); attend Rule 9019/DIP hearing (.5)	1.40	1,485.00	2,079.00
12/01/2022	ML30	Monitor the omnibus hearing (1.5)	1.50	515.00	772.50
12/16/2022	J12	Attend hearing on Debtors' mediation motion (1.5); correspond with PH team re same (.2).	1.70	930.00	1,581.00
<b>Subtotal: B155 Court Hearings</b>			<b>18.60</b>		<b>24,711.00</b>

**B160 Fee/Employment Applications**

12/07/2022	JTG4	Correspond with J. Evans regarding monthly fee applications and retention (.2); review related interim compensation order (.3)	0.50	1,585.00	792.50
12/07/2022	JDE	Review interim compensation procedures (.5); correspond with PH team regarding same (.2)	0.70	1,485.00	1,039.50
12/14/2022	KAT2	Correspond with J. Iaffaldano regarding notice of rate change (.1); review inquiries from J. Iaffaldano regarding fee matters (.1); consider and respond to same (.1)	0.30	920.00	276.00
12/16/2022	KAT2	Prepare first monthly fee request	0.70	920.00	644.00

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2344666

Page 5

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/17/2022	KAT2	Prepare first monthly fee request (.4); correspond with J. Iaffaldano and C. Edge regarding same (.1)	0.50	920.00	460.00
12/20/2022	Jl2	Draft supplemental declaration regarding retention (1.8); emails with M. Laskowski re notice of rate increase (.2); emails with J. Grogan re U.S. Trustee comments to retention order (.4); prepare revised retention order (.5)	2.90	930.00	2,697.00
12/20/2022	JTG4	Emails with H. Duran, K. Traxler and J. Iaffaldano regarding U.S. Trustee comments to retention application and proposed order	0.80	1,585.00	1,268.00
12/20/2022	KAT2	Review U.S. Trustee's comments on retention order (.1); correspond with J. Iaffaldano regarding same (.1); correspond with J. Grogan regarding same (.1); review and comment on draft supplemental declaration regarding retention (.4); correspond with J. Iaffaldano regarding same (.2); review revised first monthly fee request (.2); correspond with C. Edge regarding same (.1)	1.20	920.00	1,104.00
12/20/2022	ML30	Correspond with J. Iaffaldano regarding notice of rate change	0.10	515.00	51.50
12/20/2022	MM57	Correspond with J. Iaffaldano re: notice of change in rates	0.10	515.00	51.50
12/21/2022	DF9	Review supplemental declaration (.3); correspond with PH team re filing of same (.3)	0.60	1,610.00	966.00
12/21/2022	JTG4	Emails with D. Fliman and J. Iaffaldano regarding supplemental retention declaration	0.30	1,585.00	475.50
12/21/2022	MM57	Correspond with D. Fliman and J. Iaffaldano re: supplemental declaration (.1); e-file same (.2)	0.30	515.00	154.50
12/22/2022	JTG4	Correspond with J. Iaffaldano and D. Fliman regarding notice of rate increase	0.30	1,585.00	475.50

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2344666

Page 6

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/22/2022	MM57	Draft notice of rates increase (.3); follow up correspondence with J. Iaffaldano re: same (.1); follow-up email to J. Grogan and D. Fliman re: retention order (.2)	0.60	515.00	309.00
12/23/2022	JG32	Review and comment on retention application issues	0.60	1,735.00	1,041.00
12/23/2022	ML30	Review and revise invoice entries for compliance with bankruptcy guidelines	0.10	515.00	51.50
12/27/2022	DF9	Correspond with PH team re revised retention application order	1.20	1,610.00	1,932.00
12/27/2022	JTG4	Emails with D. Fliman and J. Evans regarding retention application (.7); review revised order (.3); review and revise Certification of Counsel (.6)	1.60	1,585.00	2,536.00
12/27/2022	JDE	Prepare form of Certificate of Counsel (0.6); correspond with PH team regarding same (0.5)	1.10	1,485.00	1,633.50
12/27/2022	ML30	Correspond with PH team regarding revised retention order (.3); review and revise retention order (.7); prepare same for e-filing (.2); e-file revised retention order (.1); update PH team regarding same (.1)	1.40	515.00	721.00
<b>Subtotal: B160 Fee/Employment Applications</b>			<b>15.90</b>		<b>18,679.50</b>

**B260 Board of Directors Matters**

12/02/2022	J12	Prepare invoice for DLP IV director (.6); email Mayer Brown regarding same (.1)	0.70	930.00	651.00
12/07/2022	DF9	Review and comment on board issues and tasks	0.40	1,610.00	644.00
12/13/2022	DF9	Correspond with client re board matters (.5); correspond with PH team re same (.9)	1.40	1,610.00	2,254.00
12/13/2022	JDE	Review and summarize board resolution	0.40	1,485.00	594.00
12/14/2022	AM50	Review draft board resolutions regarding Vida DIP approval	0.50	1,610.00	805.00
12/14/2022	DF9	Correspond with PH team re board matters	0.40	1,610.00	644.00

Conflicts Committee of GWG DLP Funding IV, LLC  
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Invoice No. 2344666

Page 7

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/14/2022	J12	Attend board meeting	0.60	930.00	558.00
12/14/2022	JDE	Attend board calls	0.60	1,485.00	891.00
12/20/2022	JG32	Review board documents	0.50	1,735.00	867.50
12/22/2022	JG32	Client correspondence regarding situation/case updates (.6)	0.60	1,735.00	1,041.00
<b>Subtotal: B260 Board of Directors Matters</b>			<b>6.10</b>		<b>8,949.50</b>
 <b>B261 Investigations</b>					
12/01/2022	JTG4	Review updates on resignation of CEO and mediation motion	0.40	1,585.00	634.00
12/01/2022	JG32	Review and comment on settlement matters	1.20	1,735.00	2,082.00
12/02/2022	DF9	Review and comment on follow up tasks following Beal settlement approval (.5); correspond with PH team regarding same (.3)	0.80	1,610.00	1,288.00
12/04/2022	JG32	Review and analyze settlement and Beal matters	1.90	1,735.00	3,296.50
12/06/2022	JG32	Situation analysis (.6); review related issues (.4)	1.00	1,735.00	1,735.00
12/07/2022	JG32	Review settlement documents and related case matters	1.80	1,735.00	3,123.00
<b>Subtotal: B261 Investigations</b>			<b>7.10</b>		<b>12,158.50</b>
<b>Total</b>			<b>62.50</b>		<b>81,505.50</b>

**Timekeeper Summary**

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
JG32	Jayne Goldstein	Partner	13.80	1,735.00	23,943.00
AM50	Allison Miller	Partner	1.70	1,610.00	2,737.00
DF9	Dan Fliman	Partner	9.40	1,610.00	15,134.00
JTG4	James T. Grogan	Partner	10.60	1,585.00	16,801.00

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2344666

Page 8

JDE	Jeremy D. Evans	Of Counsel	4.20	1,485.00	6,237.00
KAT2	Katherine A. Traxler	Of Counsel	2.70	920.00	2,484.00
J12	Jack Iaffaldano	Associate	9.20	930.00	8,556.00
ML30	Mat Laskowski	Paralegal	9.90	515.00	5,098.50
MM57	Michael Magzamen	Paralegal	1.00	515.00	515.00

**Costs incurred and advanced**

<u>Date</u>	<u>Description</u>	<u>Quantity</u>	<u>Rate</u>	<u>Amount</u>
12/02/2022	Westlaw			24.86
12/21/2022	Local - Meals - Jayme Goldstein; 12/01/2022; Restaurant: The Perfect Pint; City: New York; Working Dinner; Number of people: 3; Dinner expense with Sean Clements, Partner at Opportune LLP and D. Fliman			149.75
12/21/2022	Computer Search (Other)			0.81
12/29/2022	Local - Taxi - Jack Iaffaldano; 11/04/2022; From/To: Office/Home ; Service Type: Uber; Time: 12:13; taxi expense for car ride home from late-night work			23.26

**Total Costs incurred and advanced** \$198.68

**Current Fees and Costs** **\$81,704.18**

**Total Balance Due - Due Upon Receipt** **\$81,704.18**



**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:	)	
	)	Chapter 11
	)	
GWG Holdings, Inc., <i>et al.</i> , <sup>1</sup>	)	Case No. 22-90032 (MI)
	)	
Debtors.	)	(Jointly Administered)
	)	

**NOTICE OF THIRD MONTHLY FEE STATEMENT OF PAUL HASTINGS LLP,  
COUNSEL TO SEAN CLEMENTS AND THE CONFLICTS COMMITTEE OF THE  
BOARD OF DIRECTORS OF GWG DLP FUNDING IV, LLC FOR THE PERIOD  
FROM JANUARY 1, 2023 THROUGH JANUARY 31, 2023**

Name of applicant:	Paul Hastings LLP	
Applicant’s Role in the Case:	Attorneys to Sean Clements and the Conflicts Committee of the board of directors of GWG DLP Funding IV, LLC (“ <u>DLP IV</u> ”)	
Date Order of Employment Signed and Docket No.:	January 6, 2023 (effective as of October 31, 2022) [Docket No. 1325]	
	Beginning Date	End Date
Time period covered by this Statement:	1/1/2023	1/31/2023
Summary of Total Fees and Expenses Requested		
Total fees requested in this Statement:	\$69,286.50	
Total expenses requested in this Statement:	\$0.00	
Total fees and expenses requested in this Statement (excluding 20% holdback):	\$55,429.20	
Total fees and expenses requested in this Statement (including 20% holdback):	\$69,286.50	
Summary of Attorney Fees Requested		
Total attorney fees requested in this Statement:	\$66,660.00	

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: GWG Holdings, Inc. (2607); GWG Life, LLC (6955); GWG Life USA, LLC (5538), GWG DLP Funding IV, LLC (2589); GWG DLP Funding VI, LLC (6955); and GWG DLP Funding Holdings VI, LLC (6955). The location of Debtor GWG Holdings, Inc.'s principal place of business and the Debtors' service address is 325 N. St. Paul Street, Suite 2650 Dallas, TX 75201. Further information regarding the Debtors and these chapter 11 cases is available at the website of the Debtors' claims and noticing agent: <https://donlinrecano.com/gwg>.

Total actual attorney hours covered by this Statement:	43.40
Average hourly rate for attorneys:	\$1,536
Summary of Paraprofessional Fees Requested	
Total paraprofessional fees requested in this Statement:	\$2,626.50
Total actual paraprofessional hours covered by this Statement:	5.10
Average hourly rate for paraprofessionals:	\$515.00

In accordance with the *Corrected Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and (II) Granting Related Relief* [Docket No. 378] (the “Interim Compensation Order”),<sup>2</sup> Paul Hastings LLP (“Paul Hastings”) respectfully submits this third monthly statement (the “Monthly Statement”) and requests payment for services rendered and reimbursement of expenses incurred as counsel to Sean Clements and the Conflicts Committee of the board of directors of DLP IV in the above-captioned chapter 11 cases for the period from January 1, 2023 through and including January 31, 2023 (the “Fee Period”) in the amounts set forth above.

### **SERVICES RENDERED AND EXPENSES INCURRED**

1. Attached hereto as **Exhibit A** is a timekeeper summary that includes the name, title, department, bar admission, hourly billing rate, aggregate hours, and amount of fees earned for each Paul Hastings individual who provided services during the Fee Period.

2. Attached hereto as **Exhibit B** is a summary of Paul Hastings’ services rendered and compensation sought, by project category, for the Fee Period.

3. Attached hereto as **Exhibit C** is a summary of expenses incurred and reimbursement sought, by expense type, for the Fee Period.

4. Attached hereto as **Exhibit D** are the fee statements of Paul Hastings for services provided during the Fee Period.

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Interim Compensation Order.

### **NOTICE AND OBJECTION PROCEDURES**

5. Notice of this Monthly Statement will be given to the following parties (collectively, the “Application Recipients”): (i) the Debtors c/o GWG Holdings, Inc., 325 N. St. Paul St., Suite 2650, Dallas, TX 75201, Attn: Timothy Evans; (ii) counsel to the Debtors, Mayer Brown LLP, 71 S. Wacker Drive, Chicago, IL 60606, Attn: Thomas S. Kiriakos; (iii) co-counsel to the Debtors, Jackson Walker LLP, 1401 McKinney Street, Suite 1900, Houston, TX 77010, Attn: Kristhy M. Peguero and Matthew D. Cavanaugh; (iv) counsel to the DIP Lender, Sidley Austin LLP, One South Dearborn, Chicago, IL 60603, Attn: Matthew A. Clemente; (v) counsel to Bank of Utah in its capacity as indenture trustee for the Bonds, Akin Gump Strauss Hauer & Feld LLP, 2001 K Street NW, Washington, D.C., 20006-1037, Attn: Scott Alberino; (vi) counsel to any statutory committee appointed in these cases; and (vii) the Office of the U.S. Trustee for the Southern District of Texas, 515 Rusk Street, Suite 3516, Houston, TX 77002, Attn: Hector Duran.

6. Objections to this Monthly Statement, if any, must be served upon the Application Recipients and the undersigned counsel by or before 4:00 p.m. (CT) on the fourteenth day after service of this Monthly Statement (the “Objection Deadline”), setting forth with specificity the objectionable fees or expenses, the amount of the disputed fees or expenses, and the basis for such objection. If no objections are received by the Objection Deadline, the Debtors shall promptly pay Paul Hastings 80 percent of the fees and 100 percent of the expenses identified in this Monthly Statement.

7. To the extent that an objection to this Monthly Statement is received on or before the Objection Deadline, the Debtors shall withhold payment of that portion of this Monthly Statement to which the objection is directed and promptly pay the remainder of the fees and expenses in the percentages set forth above. To the extent such objection is not resolved,

pursuant to the procedures set forth in the Interim Compensation Order, the objecting party shall file its objection with the Court and serve the objection on the Application Recipients and the undersigned counsel. Thereafter, Paul Hastings may either (a) file with the Court a response to the objection together with a request for payment of the appropriate portion of the disputed amount or (b) preserve and schedule the disputed amount for consideration at the next interim or final fee application hearing.

8. To the extent that time or disbursement charges for services rendered or disbursements incurred relate to the Fee Period, but were not processed before the preparation of this Monthly Statement, or Paul Hastings has for any other reason not sought compensation or reimbursement with respect to such services or expenses, Paul Hastings reserves the right to request additional compensation for such services, and reimbursement of such expenses, in a supplemental or future statement.

*[Remainder of page intentionally left blank]*

Dated: February 23, 2023  
Houston, Texas

Respectfully submitted,

/s/ James T. Grogan III

**PAUL HASTINGS LLP**

James T. Grogan III (TX Bar No. 24027354)  
600 Travis Street, 58th Floor  
Houston, Texas 77002  
Telephone: (713) 860-7300  
Facsimile: (713) 353-3100  
Email: jamesgrogan@paulhastings.com

-and-

Jayme T. Goldstein (admitted *pro hac vice*)  
Daniel A. Fliman (admitted *pro hac vice*)  
Allison Miller (admitted *pro hac vice*)  
Jeremy D. Evans (admitted *pro hac vice*)  
John F. Iaffaldano (admitted *pro hac vice*)  
200 Park Avenue  
New York, New York 10166  
Telephone: (212) 318-6000  
Facsimile: (212) 319-4090  
Email: jaymegoldstein@paulhastings.com

*Counsel to Sean Clements and the Conflicts Committee of  
the board of directors of DLP IV*

**Exhibit A**

**COMPENSATION BY PROFESSIONAL AND PARAPROFESSIONAL FOR FEE PERIOD**

				Total for Fee Period	
Name	Department or Group	Date of First Admission	Hourly Rate	Hours Billed	Amount
Fliman, Dan	Corporate	2003	1,610.00	14.10	\$22,701.00
Goldstein, Jayme	Corporate	2003	1,735.00	10.40	\$18,044.00
Grogan, James	Corporate	2000	1,585.00	10.30	\$16,325.50
<b>Total Partner:</b>				<b>34.80</b>	<b>\$57,070.50</b>
Evans, Jeremy	Corporate	2013	1,485.00	2.90	\$4,306.50
Traxler, Katherine	Corporate	1990	920.00	1.80	\$1,656.00
<b>Total Counsel:</b>				<b>4.70</b>	<b>\$5,962.50</b>
Iaffaldano, Jack	Corporate	2020	930.00	3.90	\$3,627.00
<b>Total Associate:</b>				<b>3.90</b>	<b>\$3,627.00</b>
Laskowski, Mat	Paralegal		515.00	3.60	\$1,854.00
Magzamen, Michel	Paralegal		515.00	1.50	\$772.50
<b>Total Paraprofessional:</b>				<b>5.10</b>	<b>\$2,626.50</b>
<b>Total:</b>				<b>48.50</b>	<b>\$69,286.50</b>

**Exhibit B**

**COMPENSATION BY PROJECT CATEGORY FOR FEE PERIOD**

		Total for Fee Period	
U.S. Trustee Task Code and Project Category		Total Hours	Total Fees
B110	Case Administration	8.20	\$12,841.00
B113	Pleadings Review	8.50	\$9,381.50
B160	Employment / Fee Applications (Paul Hastings)	17.40	\$23,705.00
B260	Board of Directors Matters	2.60	\$3,883.50
B261	Investigations	1.10	\$1,633.50
B320	Plan and Disclosure Statement (including business plan)	10.70	\$17,842.00
<b>TOTAL</b>		<b>48.50</b>	<b>\$69,286.50</b>

**Exhibit C**

**EXPENSE SUMMARY FOR FEE PERIOD**

Category	Total for Fee Period
<b>TOTAL</b>	<b>\$0.00</b>



**Exhibit D**

**FEE STATEMENTS FOR FEE PERIOD**



**PAUL HASTINGS LLP**  
200 Park Avenue, New York, NY 10166-3205  
t: +1.212.318.6000 | f: +1.212.319.4090 | [www.paulhastings.com](http://www.paulhastings.com)

Conflicts Committee of GWG DLP Funding IV, LLC  
Suite 1200  
220 South Sixth Street  
Minneapolis, MN 55402

February 22, 2023

Please Refer to  
Invoice Number: 2348411

Attn: Sean Clements

PH LLP Tax ID No. 95-2209675

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## SUMMARY SHEET

### **Bankruptcy Case**

PH LLP Client/Matter # 51132-00002  
Jayme Goldstein

Legal fees for professional services  
for the period ending January 31, 2023

\$69,286.50

### **Current Fees and Costs Due**

**\$69,286.50**

### **Total Balance Due - Due Upon Receipt**

**\$69,286.50**

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We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

***TO PROTECT AGAINST FRAUD***, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Teri Goffredo @ 213-683-5045 or via email @ [terigoffredo@paulhastings.com](mailto:terigoffredo@paulhastings.com) and requesting written and verbal confirmation.

### **Wiring and ACH Instructions:**

Citibank  
ABA # 322271724  
SWIFT Address: CITIUS33  
787 W. 5th Street  
Los Angeles, CA 90071  
Account Number: 206628380  
Account Name: Paul Hastings LLP

### **Remittance Address:**

Paul Hastings LLP  
Lockbox 4803  
PO Box 894803  
Los Angeles, CA 90189-4803

For wires, please reference the invoice, client and matter number(s) being paid

For ACH payments, please use the CTX format and/or send any remittances to [cashepn@paulhastings.com](mailto:cashepn@paulhastings.com). This is a no-reply mailbox

Please refer all questions to [billing@paulhastings.com](mailto:billing@paulhastings.com)



**PAUL HASTINGS LLP**  
200 Park Avenue, New York, NY 10166-3205  
t: +1.212.318.6000 | f: +1.212.319.4090 | [www.paulhastings.com](http://www.paulhastings.com)

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Suite 1200  
220 South Sixth Street  
Minneapolis, MN 55402

February 22, 2023

Please Refer to  
Invoice Number: 2348411

Attn: Sean Clements

PH LLP Tax ID No. 95-2209675

---

## REMITTANCE COPY

### **Bankruptcy Case**

PH LLP Client/Matter # 51132-00002  
Jayme Goldstein

Legal fees for professional services  
for the period ending January 31, 2023

\$69,286.50

**Current Fees and Costs Due**

**\$69,286.50**

**Total Balance Due - Due Upon Receipt**

**\$69,286.50**

---

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

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### **Wiring and ACH Instructions:**

Citibank  
ABA # 322271724  
SWIFT Address: CITIUS33  
787 W. 5th Street  
Los Angeles, CA 90071  
Account Number: 206628380  
Account Name: Paul Hastings LLP

### **Remittance Address:**

Paul Hastings LLP  
Lockbox 4803  
PO Box 894803  
Los Angeles, CA 90189-4803

For wires, please reference the invoice, client and matter number(s) being paid

For ACH payments, please use the CTX format and/or send any remittances to [cashepn@paulhastings.com](mailto:cashepn@paulhastings.com). This is a no-reply mailbox

Please refer all questions to [billing@paulhastings.com](mailto:billing@paulhastings.com)



**PAUL HASTINGS LLP**  
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t: +1.212.318.6000 | f: +1.212.319.4090 | www.paulhastings.com

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Suite 1200  
220 South Sixth Street  
Minneapolis, MN 55402

February 22, 2023

Please Refer to  
Invoice Number: 2348411

Attn: Sean Clements

PH LLP Tax ID No. 95-2209675

FOR PROFESSIONAL SERVICES RENDERED  
for the period ending January 31, 2023

**Bankruptcy Case** **\$69,286.50**

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>B110 Case Administration</b>					
01/03/2023	JTG4	Email with M. Laskowski regarding case update	0.20	1,585.00	317.00
01/04/2023	JTG4	Email with M. Laskowski regarding case update (.2); review ECF notices (.2)	0.40	1,585.00	634.00
01/05/2023	JTG4	Review ECF notices	0.20	1,585.00	317.00
01/06/2023	JTG4	Email with M. Laskowski regarding case update (.3); review ECF notices (.3)	0.60	1,585.00	951.00
01/07/2023	JG32	Review case updates (.7); correspond with client regarding same (.4)	1.10	1,735.00	1,908.50
01/09/2023	JTG4	Email with M. Laskowski regarding case update	0.20	1,585.00	317.00
01/10/2023	JTG4	Email with M. Laskowski regarding case update	0.20	1,585.00	317.00
01/11/2023	JTG4	Email with M. Laskowski regarding case update	0.20	1,585.00	317.00
01/12/2023	JTG4	Review ECF notices (.3); email with M. Laskowski regarding case update (.2)	0.50	1,585.00	792.50

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2348411

Page 2

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/13/2023	JTG4	Email with M. Laskowski regarding case update	0.40	1,585.00	634.00
01/17/2023	JTG4	Email with M. Laskowski regarding case update (.2); review ECF notices (.2)	0.40	1,585.00	634.00
01/18/2023	JTG4	Email with M. Laskowski regarding case update (.2); review ECF notices (.2)	0.40	1,585.00	634.00
01/19/2023	JTG4	Email with M. Laskowski regarding case update (.2); review ECF notices (.2)	0.40	1,585.00	634.00
01/20/2023	JTG4	Email with M. Laskowski regarding case update (.2); review ECF notices (.2)	0.40	1,585.00	634.00
01/23/2023	JTG4	Email with M. Magzamen regarding case update (.2); review ECF notices (.2)	0.40	1,585.00	634.00
01/24/2023	JTG4	Email with M. Magzamen regarding case update (.3); review ECF notices (.3)	0.60	1,585.00	951.00
01/24/2023	MM57	Calendar critical dates (.1); correspond with J. Iaffaldano re: hearing (.1)	0.20	515.00	103.00
01/25/2023	JTG4	Email with M. Magzamen regarding case update	0.30	1,585.00	475.50
01/25/2023	MM57	Calendar critical dates	0.10	515.00	51.50
01/26/2023	JTG4	Email with M. Magzamen regarding case update	0.20	1,585.00	317.00
01/27/2023	JTG4	Email with M. Magzamen about case updates	0.10	1,585.00	158.50
01/30/2023	JTG4	Email with M. Laskowski regarding case update (.2); review ECF notices (.2)	0.40	1,585.00	634.00
01/31/2023	JTG4	Email with M. Laskowski regarding case update (.2); review ECF notices (.1)	0.30	1,585.00	475.50
<b>Subtotal: B110 Case Administration</b>			<b>8.20</b>		<b>12,841.00</b>

**B113 Pleadings Review**

01/03/2023	ML30	Review recent filings and update working group re: same	0.20	515.00	103.00
01/04/2023	ML30	Review recent filings and update working group re: same	0.20	515.00	103.00

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2348411

Page 3

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/05/2023	JG32	Pleading review	1.30	1,735.00	2,255.50
01/05/2023	ML30	Review recent filings and update working group re: same	0.20	515.00	103.00
01/06/2023	ML30	Review recent filings and update working group re: same	0.20	515.00	103.00
01/07/2023	JG32	General pleading review	0.40	1,735.00	694.00
01/09/2023	JG32	Pleading review	0.80	1,735.00	1,388.00
01/09/2023	ML30	Review recent filings and update working group re: same	0.20	515.00	103.00
01/10/2023	ML30	Review recent filings and update working group re: same	0.20	515.00	103.00
01/11/2023	ML30	Review recent filings and update working group re: same	0.20	515.00	103.00
01/12/2023	ML30	Monitor the docket and review recent pleadings (.1); prepare end of day update for working group re same (.1)	0.20	515.00	103.00
01/13/2023	JG32	Pleadings review	0.90	1,735.00	1,561.50
01/13/2023	ML30	Monitor the docket and review recent filings (.2); prepare end of day update for working group re same (.1); update case calendars re same (.1)	0.40	515.00	206.00
01/15/2023	JTG4	Review ECF notices and related pleadings	0.80	1,585.00	1,268.00
01/17/2023	ML30	Monitor the docket and review recent filings (.2); prepare end of day update for working group re same (.1); update case calendars re same (.1)	0.40	515.00	206.00
01/18/2023	ML30	Monitor the docket and review recent filings (.2); prepare end of day update for working group re same (.1); update case calendars re same (.1)	0.40	515.00	206.00
01/19/2023	ML30	Monitor the docket and prepare end of day update and case calendar update for working group	0.20	515.00	103.00
01/20/2023	ML30	Monitor the docket and prepare end of day update and case calendar update for working group	0.20	515.00	103.00

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2348411

Page 4

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/23/2023	MM57	Review recent filings in GWG case dockets and update working group re: same	0.20	515.00	103.00
01/24/2023	MM57	Review recent filings and update working group re: same.	0.10	515.00	51.50
01/25/2023	MM57	Review recent filings and update working group re: same.	0.20	515.00	103.00
01/26/2023	MM57	Review recent case filings and update working group re: same	0.10	515.00	51.50
01/27/2023	MM57	Review recent case filings and update working group re: same	0.10	515.00	51.50
01/30/2023	ML30	Review recent case filings and update working group and case calendars re same	0.20	515.00	103.00
01/31/2023	ML30	Review recent case filings and update working group and case calendars re same	0.20	515.00	103.00
<b>Subtotal: B113 Pleadings Review</b>			<b>8.50</b>		<b>9,381.50</b>

**B160 Fee/Employment Applications**

01/02/2023	KAT2	Correspond with J. Iaffaldano regarding professional fee matters (.1); correspond with C. Edge regarding same (.1)	0.20	920.00	184.00
01/04/2023	KAT2	Review inquiries from J. Iaffaldano regarding fee matters (.1); consider and respond to same (.1)	0.20	920.00	184.00
01/05/2023	JTG4	Correspond with D. Fliman regarding retention order (.4); emails with J. Evans about same (.2)	0.60	1,585.00	951.00
01/05/2023	JDE	Correspond with D. Fliman, J. Grogan regarding bar date and retention application	0.60	1,485.00	891.00
01/05/2023	KAT2	Correspond with J. Iaffaldano and C. Edge regarding fee matters	0.20	920.00	184.00
01/06/2023	DF9	Review and comment on fee applications for November and December 2022 services.	1.20	1,610.00	1,932.00

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2348411

Page 5

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/06/2023	J12	Review and revise fee statement and director invoice (.3); email Mayer Brown re same (.1)	0.40	930.00	372.00
01/06/2023	JTG4	Email Chambers regarding CNO on retention order and related matters (.3); correspond with D. Fliman about same (.3)	0.60	1,585.00	951.00
01/07/2023	JG32	Review and comment on retention issues	0.60	1,735.00	1,041.00
01/09/2023	DF9	Review and comment on fee applications for November and December services.	0.60	1,610.00	966.00
01/10/2023	DF9	Review and comment on fee applications for November and December services.	0.60	1,610.00	966.00
01/10/2023	JTG4	Correspond with D. Fliman regarding fee application process	0.30	1,585.00	475.50
01/11/2023	DF9	Review and comment on fee applications for November and December services.	0.60	1,610.00	966.00
01/11/2023	J12	Prepare fee requests for November and December services	1.80	930.00	1,674.00
01/11/2023	JTG4	Correspond with J. Iaffaldano regarding rate change notice	0.40	1,585.00	634.00
01/11/2023	KAT2	Review fee inquiries from J. Iaffaldano (.1); consider and respond to same (.1); correspond with J. Iaffaldano regarding notice of rate change and fee matters (.3); prepare insert to first monthly fee request (.2); review retention order approving PH's retention (.1)	0.80	920.00	736.00
01/12/2023	DF9	Review and comment on fee applications for November and December services.	0.50	1,610.00	805.00
01/12/2023	J12	Prepare fee request for November services (.6); prepare fee request for December services (.6)	1.20	930.00	1,116.00
01/12/2023	MM57	Review and e-file notice of rate change	0.20	515.00	103.00
01/13/2023	DF9	Review and revise fee statements (1.8); review and comment on fee application filing (.5)	2.30	1,610.00	3,703.00
01/13/2023	JTG4	Emails with D. Fliman and J. Iaffaldano regarding fee application	0.40	1,585.00	634.00



Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2348411

Page 6

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/13/2023	KAT2	Review interim compensation order (.1); review first and second monthly fee requests (.2); review notice of rate change (.1)	0.40	920.00	368.00
01/13/2023	MM57	Correspond with D. Fliman re: filing of fee statements (.1); e-file fee statements (.2)	0.30	515.00	154.50
01/24/2023	DF9	Correspond with J. Iaffaldano re fee statement (.5); analyze related court documents (.4); correspond with PH team re same (.3)	1.20	1,610.00	1,932.00
01/24/2023	JDE	Correspond with Company advisors regarding monthly fee statement (.3); review DIP order regarding same (.6); correspond with PH team regarding same (.3)	1.20	1,485.00	1,782.00
<b>Subtotal: B160 Fee/Employment Applications</b>			<b>17.40</b>		<b>23,705.00</b>

**B260 Board of Directors Matters**

01/11/2023	DF9	Participate in DLP IV board update call	0.50	1,610.00	805.00
01/11/2023	J12	Attend DLP IV board meeting	0.50	930.00	465.00
01/13/2023	JG32	Correspond with client regarding case update	0.30	1,735.00	520.50
01/25/2023	DF9	Participate in board meeting re mediation updates (.5); analysis re same and related considerations (.8)	1.30	1,610.00	2,093.00
<b>Subtotal: B260 Board of Directors Matters</b>			<b>2.60</b>		<b>3,883.50</b>

**B261 Investigations**

01/23/2023	JDE	Review pleadings re motion to seal.	1.10	1,485.00	1,633.50
<b>Subtotal: B261 Investigations</b>			<b>1.10</b>		<b>1,633.50</b>

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2348411

Page 7

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>B320 Plan and Disclosure Statement (including Business Plan)</b>					
01/05/2023	DF9	Correspond with J. Evans re plan mediation (.2); review related issues / tasks (.4)	0.60	1,610.00	966.00
01/05/2023	JG32	Review and comment on mediation matters (.8); correspond with client regarding same and case issues (.6)	1.40	1,735.00	2,429.00
01/06/2023	DF9	Review documents re plan mediation (1.3); correspond with Debtors' counsel re same (.4); correspond with client re same (.5); correspond with PH team re same (1.3)	3.50	1,610.00	5,635.00
01/07/2023	JG32	Mediation documentation and analysis	0.80	1,735.00	1,388.00
01/09/2023	JG32	Mediation analysis	0.40	1,735.00	694.00
01/11/2023	DF9	Correspond with PH team re mediation (.4); correspond with Mintz re same (.4)	0.80	1,610.00	1,288.00
01/13/2023	JG32	Review and comment on mediation matters	1.20	1,735.00	2,082.00
01/14/2023	DF9	Correspond with J. Evans re plan mediation issues / tasks.	0.40	1,610.00	644.00
01/14/2023	JTG4	Email with A. Alonzo about upcoming mediation	0.10	1,585.00	158.50
01/20/2023	JTG4	Email with A. Alonzo about mediation	0.10	1,585.00	158.50
01/23/2023	JTG4	Email with J. Tecce about mediation	0.10	1,585.00	158.50
01/28/2023	JTG4	Email with T. Kirkendall about mediation	0.10	1,585.00	158.50
01/30/2023	JG32	Correspond with D. Fliman and J. Goldstein regarding mediation update, case and investigation matters (.9); update telephone conference with S. Clements (.3)	1.20	1,735.00	2,082.00
<b>Subtotal: B320 Plan and Disclosure Statement (including Business Plan)</b>			<b>10.70</b>		<b>17,842.00</b>
<b>Total</b>			<b>48.50</b>		<b>69,286.50</b>

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2348411

Page 8

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**Timekeeper Summary**

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
JG32	Jayne Goldstein	Partner	10.40	1,735.00	18,044.00
DF9	Dan Fliman	Partner	14.10	1,610.00	22,701.00
JTG4	James T. Grogan	Partner	10.30	1,585.00	16,325.50
JDE	Jeremy D. Evans	Of Counsel	2.90	1,485.00	4,306.50
KAT2	Katherine A. Traxler	Of Counsel	1.80	920.00	1,656.00
JI2	Jack Iaffaldano	Associate	3.90	930.00	3,627.00
ML30	Mat Laskowski	Paralegal	3.60	515.00	1,854.00
MM57	Michael Magzamen	Paralegal	1.50	515.00	772.50

**Current Fees and Costs** **\$69,286.50**

**Total Balance Due - Due Upon Receipt** **\$69,286.50**

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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:	)	
	)	Chapter 11
GWG Holdings, Inc., <i>et al.</i> , <sup>1</sup>	)	
	)	Case No. 22-90032 (MI)
Debtors.	)	
	)	(Jointly Administered)

**NOTICE OF FOURTH MONTHLY FEE STATEMENT OF PAUL HASTINGS LLP,  
COUNSEL TO SEAN CLEMENTS AND THE CONFLICTS COMMITTEE OF THE  
BOARD OF DIRECTORS OF GWG DLP FUNDING IV, LLC FOR THE PERIOD  
FROM FEBRUARY 1, 2023 THROUGH FEBRUARY 28, 2023**

Name of applicant:	Paul Hastings LLP	
Applicant's Role in the Case:	Attorneys to Sean Clements and the Conflicts Committee of the board of directors of GWG DLP Funding IV, LLC (" <u>DLP IV</u> ")	
Date Order of Employment Signed and Docket No.:	January 6, 2023 (effective as of October 31, 2022) [Docket No. 1325]	
	Beginning Date	End Date
Time period covered by this Statement:	02/01/2023	02/28/2023
Summary of Total Fees and Expenses Requested		
Total fees requested in this Statement:	\$41,358.80 (80% of \$51,698.50)	
Total expenses requested in this Statement:	\$2.70	
Total fees and expenses requested in this Statement (excluding 20% holdback):	\$51,701.20	
Total fees and expenses requested in this Statement (including 20% holdback):	\$41,361.50	
Summary of Attorney Fees Requested		
Total attorney fees requested in this Statement:	\$48,242.50	

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: GWG Holdings, Inc. (2607); GWG Life, LLC (6955); GWG Life USA, LLC (5538), GWG DLP Funding IV, LLC (2589); GWG DLP Funding VI, LLC (6955); and GWG DLP Funding Holdings VI, LLC (6955). The location of Debtor GWG Holdings, Inc.'s principal place of business and the Debtors' service address is 325 N. St. Paul Street, Suite 2650 Dallas, TX 75201. Further information regarding the Debtors and these chapter 11 cases is available at the website of the Debtors' claims and noticing agent: <https://donlinrecano.com/gwg>.

Total actual attorney hours covered by this Statement:	29.50
Average hourly rate for attorneys:	\$1,635
Summary of Paraprofessional Fees Requested	
Total paraprofessional fees requested in this Statement:	\$3,456.00
Total actual paraprofessional hours covered by this Statement:	6.40
Average hourly rate for paraprofessionals:	\$540

In accordance with the *Corrected Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and (II) Granting Related Relief* [Docket No. 378] (the “Interim Compensation Order”),<sup>2</sup> Paul Hastings LLP (“Paul Hastings”) respectfully submits this fourth monthly statement (the “Monthly Statement”) and requests payment for services rendered and reimbursement of expenses incurred as counsel to Sean Clements and the Conflicts Committee of the board of directors of DLP IV in the above-captioned chapter 11 cases for the period from February 1, 2023 through and including February 28, 2023 (the “Fee Period”) in the amounts set forth above

### **SERVICES RENDERED AND EXPENSES INCURRED**

1. Attached hereto as **Exhibit A** is a timekeeper summary that includes the name, title, department, bar admission, hourly billing rate, aggregate hours, and amount of fees earned for each Paul Hastings individual who provided services during the Fee Period.

2. Attached hereto as **Exhibit B** is a summary of Paul Hastings’ services rendered and compensation sought, by project category, for the Fee Period.

3. Attached hereto as **Exhibit C** is a summary of expenses incurred and reimbursement sought, by expense type, for the Fee Period.

4. Attached hereto as **Exhibit D** are the fee statements of Paul Hastings for services provided during the Fee Period.

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Interim Compensation Order.

### **NOTICE AND OBJECTION PROCEDURES**

1. Notice of this Monthly Statement will be given to the following parties (collectively, the “Application Recipients”): (i) the Debtors c/o GWG Holdings, Inc., 325 N. St. Paul St., Suite 2650, Dallas, TX 75201, Attn: Timothy Evans; (ii) counsel to the Debtors, Mayer Brown LLP, 71 S. Wacker Drive, Chicago, IL 60606, Attn: Thomas S. Kiriakos; (iii) co-counsel to the Debtors, Jackson Walker LLP, 1401 McKinney Street, Suite 1900, Houston, TX 77010, Attn: Kristhy M. Peguero and Matthew D. Cavanaugh; (iv) counsel to the DIP Lender, Sidley Austin LLP, One South Dearborn, Chicago, IL 60603, Attn: Matthew A. Clemente; (v) counsel to Bank of Utah in its capacity as indenture trustee for the Bonds, Akin Gump Strauss Hauer & Feld LLP, 2001 K Street NW, Washington, D.C., 20006-1037, Attn: Scott Alberino; (vi) counsel to any statutory committee appointed in these cases; and (vii) the Office of the U.S. Trustee for the Southern District of Texas, 515 Rusk Street, Suite 3516, Houston, TX 77002, Attn: Hector Duran.

2. Objections to this Monthly Statement, if any, must be served upon the Application Recipients and the undersigned counsel by or before 4:00 p.m. (CT) on the fourteenth day after service of this Monthly Statement (the “Objection Deadline”), setting forth with specificity the objectionable fees or expenses, the amount of the disputed fees or expenses, and the basis for such objection. If no objections are received by the Objection Deadline, the Debtors shall promptly pay Paul Hastings 80 percent of the fees and 100 percent of the expenses identified in this Monthly Statement.

3. To the extent that an objection to this Monthly Statement is received on or before the Objection Deadline, the Debtors shall withhold payment of that portion of this Monthly Statement to which the objection is directed and promptly pay the remainder of the fees and expenses in the percentages set forth above. To the extent such objection is not resolved,

pursuant to the procedures set forth in the Interim Compensation Order, the objecting party shall file its objection with the Court and serve the objection on the Application Recipients and the undersigned counsel. Thereafter, Paul Hastings may either (a) file with the Court a response to the objection together with a request for payment of the appropriate portion of the disputed amount or (b) preserve and schedule the disputed amount for consideration at the next interim or final fee application hearing.

4. To the extent that time or disbursement charges for services rendered or disbursements incurred relate to the Fee Period, but were not processed before the preparation of this Monthly Statement, or Paul Hastings has for any other reason not sought compensation or reimbursement with respect to such services or expenses, Paul Hastings reserves the right to request additional compensation for such services, and reimbursement of such expenses, in a supplemental or future statement.

*[Remainder of page intentionally left blank]*

Dated: May 16, 2023  
Houston, Texas

Respectfully submitted,

*/s/ James T. Grogan III*

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**PAUL HASTINGS LLP**

James T. Grogan III (TX Bar No. 24027354)  
600 Travis Street, 58th Floor  
Houston, Texas 77002  
Telephone: (713) 860-7300  
Facsimile: (713) 353-3100  
Email: jamesgrogan@paulhastings.com

-and-

Jayme T. Goldstein (admitted *pro hac vice*)  
Daniel A Fliman (admitted *pro hac vice*)  
Allison Miller (admitted *pro hac vice*)  
Jeremy D. Evans (admitted *pro hac vice*)  
John F. Iaffaldano (admitted *pro hac vice*)  
200 Park Avenue  
New York, New York 10166  
Telephone: (212) 318-6000  
Facsimile: (212) 319-4090  
Email: jaymegoldstein@paulhastings.com

*Counsel to Sean Clements and the Conflicts Committee of  
the board of directors of DLP IV*



**Exhibit A**

**COMPENSATION BY PROFESSIONAL AND PARAPROFESSIONAL FOR FEE PERIOD**

				Total for Fee Period	
Name	Department or Group	Date of First Admission	Hourly Rate	Hours Billed	Amount
Fliman, Dan	Corporate	2003	\$1,725.00	2.20	\$3,795.00
Goldstein, Jayme	Corporate	2003	\$1,875.00	6.80	\$12,750.00
Grogan, James	Corporate	2000	\$1,700.00	12.70	\$21,590.00
<b>Total Partner:</b>				<b>21.70</b>	<b>\$38,135.00</b>
Evans, Jeremy	Corporate	2013	\$1,600.00	3.10	\$4,960.00
Traxler, Katherine	Corporate	1990	\$1,025.00	1.40	\$1,435.00
<b>Total Counsel:</b>				<b>4.50</b>	<b>\$6,395.00</b>
Iaffaldano, Jack	Corporate	2020	\$1,125.00	3.30	\$3,712.50
<b>Total Associate:</b>				<b>3.30</b>	<b>\$3,712.50</b>
Laskowski, Mat	Paralegal		\$540.00	5.90	\$3,186.00
Magzamen, Michel	Paralegal		\$540.00	0.50	\$270.00
<b>Total Paraprofessional:</b>				<b>6.40</b>	<b>\$3,456.00</b>
<b>Total:</b>				<b>35.90</b>	<b>\$51,698.50</b>

**Exhibit B**

**COMPENSATION BY PROJECT CATEGORY FOR FEE PERIOD**

		Total for Fee Period	
U.S. Trustee Task Code and Project Category		Total Hours	Total Fees
B110	Case Administration	8.00	\$12,788.00
B113	Pleadings Review	5.20	\$2,808.00
B160	Employment / Fee Applications (Paul Hastings)	6.00	\$7,245.00
B190	Other Contested Matters(excl. assumption/rejections motions)	1.50	\$2,550.00
B260	Board of Directors Matters	0.50	\$800.00
B261	Investigations	0.90	\$1,480.00
B320	Plan and Disclosure Statement	13.80	\$24,027.50
<b>TOTAL</b>		<b>35.90</b>	<b>\$51,698.50</b>

**Exhibit C**

**EXPENSE SUMMARY FOR FEE PERIOD**

Category	Total for Fee Period
Computer Search	\$2.70
<b>TOTAL</b>	<b>\$2.70</b>

**Exhibit D**

**FEE STATEMENTS FOR FEE PERIOD**



**PAUL HASTINGS LLP**  
200 Park Avenue, New York, NY 10166-3205  
t: +1.212.318.6000 | f: +1.212.319.4090 | [www.paulhastings.com](http://www.paulhastings.com)

Conflicts Committee of GWG DLP Funding IV, LLC  
Suite 1200  
220 South Sixth Street  
Minneapolis, MN 55402

May 3, 2023

Please Refer to  
Invoice Number: 2356362

Attn: Sean Clements

PH LLP Tax ID No. 95-2209675

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## SUMMARY SHEET

### **Bankruptcy Case**

PH LLP Client/Matter # 51132-00002  
Jayme Goldstein

Legal fees for professional services for the period ending February 28, 2023	\$51,698.50
Costs incurred and advanced	2.70
<b>Current Fees and Costs Due</b>	<b>\$51,701.20</b>
<b>Total Balance Due - Due Upon Receipt</b>	<b>\$51,701.20</b>

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

***TO PROTECT AGAINST FRAUD***, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Teri Goffredo @ 213-683-5045 or via email @ [terigoffredo@paulhastings.com](mailto:terigoffredo@paulhastings.com) and requesting written and verbal confirmation.



**PAUL HASTINGS LLP**  
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Conflicts Committee of GWG DLP Funding IV, LLC  
Suite 1200  
220 South Sixth Street  
Minneapolis, MN 55402

May 3, 2023

Please Refer to  
Invoice Number: 2356362

Attn: Sean Clements

PH LLP Tax ID No. 95-2209675

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### REMITTANCE COPY

#### **Bankruptcy Case**

PH LLP Client/Matter # 51132-00002  
Jayme Goldstein

Legal fees for professional services for the period ending February 28, 2023	\$51,698.50
Costs incurred and advanced	2.70
<b>Current Fees and Costs Due</b>	<b>\$51,701.20</b>
<b>Total Balance Due - Due Upon Receipt</b>	<b>\$51,701.20</b>

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***TO PROTECT AGAINST FRAUD***, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Teri Goffredo @ 213-683-5045 or via email @ [terigoffredo@paulhastings.com](mailto:terigoffredo@paulhastings.com) and requesting written and verbal confirmation.

For wires, please reference the invoice, client and matter number(s) being paid  
For ACH payments, please use the CTX format and/or send any remittances to [cashepn@paulhastings.com](mailto:cashepn@paulhastings.com) This is a no-reply mailbox  
Please refer all questions to [billing@paulhastings.com](mailto:billing@paulhastings.com)



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Conflicts Committee of GWG DLP Funding IV, LLC May 3, 2023  
Suite 1200  
220 South Sixth Street  
Minneapolis, MN 55402

Please Refer to  
Invoice Number: 2356362

Attn: Sean Clements

PH LLP Tax ID No. 95-2209675

FOR PROFESSIONAL SERVICES RENDERED  
for the period ending February 28, 2023

**Bankruptcy Case** **\$51,698.50**

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>B110 Case Administration</b>					
02/01/2023	JTG4	Email with M. Laskowski regarding case update (.2); review ECF notices (.1).	0.30	1,700.00	510.00
02/03/2023	JTG4	Email with M. Laskowski regarding case update (.2); review ECF notices (.1).	0.30	1,700.00	510.00
02/06/2023	JTG4	Email with M. Laskowski regarding case update (.2); review ECF notices (.1).	0.30	1,700.00	510.00
02/09/2023	JTG4	Email with M. Laskowski regarding case update (.2); review ECF notices (.1).	0.30	1,700.00	510.00
02/10/2023	JTG4	Email with M. Laskowski regarding case update (.3); review ECF notices (.5).	0.80	1,700.00	1,360.00
02/12/2023	JTG4	Emails with M. Laskowski regarding case update and recent filings.	0.30	1,700.00	510.00
02/12/2023	ML30	Review notices of filing of pleadings (.1); obtain new documents (.2); organize (.1); circulate (.1); update case calendars (.2).	0.70	540.00	378.00
02/13/2023	JTG4	Email with M. Laskowski regarding case update (.2); review ECF notices (.2).	0.40	1,700.00	680.00
02/14/2023	JTG4	Email with M. Laskowski regarding case update (.2); review ECF notices (.1).	0.30	1,700.00	510.00

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2356362

Page 2

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
02/15/2023	JTG4	Email with M. Laskowski regarding case update (.3); review ECF notices (.2).	0.50	1,700.00	850.00
02/16/2023	JTG4	Email with M. Laskowski regarding case update (.1); review ECF notices (.2).	0.30	1,700.00	510.00
02/17/2023	JTG4	Email with M. Laskowski regarding case update (.1); review ECF notices (.2).	0.30	1,700.00	510.00
02/21/2023	JTG4	Email with M. Laskowski regarding case update (.2); review ECF notices and related pleadings (.6).	0.80	1,700.00	1,360.00
02/22/2023	JTG4	Email with M. Laskowski regarding case update (.2); review ECF notices and related pleadings (.7).	0.90	1,700.00	1,530.00
02/24/2023	JTG4	Email with M. Laskowski regarding case update (.2); review ECF notices and related pleadings (.3).	0.50	1,700.00	850.00
02/27/2023	JTG4	Email with M. Laskowski regarding case update (.2); review ECF notices and related pleadings (.3).	0.50	1,700.00	850.00
02/28/2023	JTG4	Email with M. Laskowski regarding case update (.2); review ECF notices and related pleadings (.3).	0.50	1,700.00	850.00
<b>Subtotal: B110 Case Administration</b>			<b>8.00</b>		<b>12,788.00</b>

**B113 Pleadings Review**

02/01/2023	ML30	Monitor the docket (.1); prepare end of day update and calendar update for working group re: same (.2); correspond with D. Fliman re certain case documents needed (.1); briefly review and follow up with D. Fliman re same (.2).	0.60	540.00	324.00
02/02/2023	ML30	Monitor the docket (.1); prepare end of day update and calendar update for working group re same (.1).	0.20	540.00	108.00
02/03/2023	ML30	Monitor the docket (.1); prepare end of day update and calendar update for working group re same (.1).	0.20	540.00	108.00



Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2356362

Page 3

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
02/06/2023	ML30	Monitor the docket (.1); prepare end of day update and calendar update for working group re same (.1).	0.20	540.00	108.00
02/07/2023	ML30	Monitor the docket (.1); prepare end of day update and calendar update for working group re same (.1).	0.20	540.00	108.00
02/08/2023	ML30	Monitor the docket (.1); prepare end of day update for working group re same (.1).	0.20	540.00	108.00
02/09/2023	ML30	Monitor the docket (.1); prepare end of day update for working group re same (.1).	0.20	540.00	108.00
02/10/2023	ML30	Monitor the docket (.1); prepare end of day update for working group re same (.1).	0.20	540.00	108.00
02/13/2023	ML30	Review recent case filings and update working group and case calendars re same.	0.50	540.00	270.00
02/14/2023	ML30	Review recent case filings and update working group re same.	0.30	540.00	162.00
02/15/2023	ML30	Review recent case filings and update working group re same.	0.20	540.00	108.00
02/16/2023	ML30	Review recent case filings and update working group re same.	0.20	540.00	108.00
02/17/2023	ML30	Review recent case filings and update working group re same.	0.20	540.00	108.00
02/21/2023	ML30	Review recent case filings and update working group re same.	0.10	540.00	54.00
02/22/2023	ML30	Review recent case filings and update working group re same.	0.60	540.00	324.00
02/23/2023	ML30	Review recent case filings and update working group and case calendars re same.	0.50	540.00	270.00
02/24/2023	ML30	Review recent case filings and update working group re same.	0.20	540.00	108.00
02/27/2023	ML30	Monitor the docket and prepare end of day update for working group.	0.20	540.00	108.00
02/28/2023	ML30	Monitor the docket and prepare end of day update for working group.	0.20	540.00	108.00
<b>Subtotal: B113 Pleadings Review</b>			<b>5.20</b>		<b>2,808.00</b>

Conflicts Committee of GWG DLP Funding IV, LLC  
 51132-00002  
 Invoice No. 2356362

Page 4

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>B160 Fee/Employment Applications</b>					
02/07/2023	J12	Prepare invoice for S. Clements (.4); emails with L. Chiappetta re same (.2).	0.60	1,125.00	675.00
02/10/2023	JTG4	Emails with K. Traxler and C. Edge about interim fee application.	0.40	1,700.00	680.00
02/10/2023	KAT2	Review inquiries from J. Iaffaldano regarding fee matters (.1); review interim compensation order and precedent interim fee applications (.3); review correspondence from C. Edge regarding January services (.1); prepare response to J. Iaffaldano regarding interim fees and interim fee application (.2).	0.70	1,025.00	717.50
02/11/2023	KAT2	Review inquiries from J. Iaffaldano regarding interim fee application and related fee matters (.1); consider and respond to same (.1).	0.20	1,025.00	205.00
02/13/2023	J12	Revise January fee statement.	0.80	1,125.00	900.00
02/15/2023	KAT2	Prepare UST Appendix B information for fee application (.2); review monthly fee request and correspond with J. Iaffaldano regarding same (.1).	0.30	1,025.00	307.50
02/16/2023	JDE	Revise monthly fee statement.	0.50	1,600.00	800.00
02/21/2023	J12	Prepare fee statement.	1.00	1,125.00	1,125.00
02/22/2023	KAT2	Review monthly fee request and related correspondence from J. Iaffaldano and C. Edge.	0.20	1,025.00	205.00
02/23/2023	JTG4	Emails with J. Iaffaldano about January fee applications (.3); review and revise same (.3); emails with M. Magzamen about filing same (.2).	0.80	1,700.00	1,360.00
02/23/2023	MM57	Finalize fee statement and circulate to working group (.4); e-file same (.1).	0.50	540.00	270.00
<b>Subtotal: B160 Fee/Employment Applications</b>			<b>6.00</b>		<b>7,245.00</b>

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2356362

Page 5

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>B190 Other Contested Matters(excl. assumption/rejections motions)</b>					
02/09/2023	JTG4	Review letter from B. Rosen to Judge Jones (.2); emails with Rosen, Reisman, and Barnowski about same (.5).	0.70	1,700.00	1,190.00
02/16/2023	JTG4	Review motion to quash filed by Obra.	0.30	1,700.00	510.00
02/28/2023	JTG4	Review long email and attachments from J. Tecce regarding Heppner opposition to standing motion (.5).	0.50	1,700.00	850.00
<b>Subtotal: B190 Other Contested Matters(excl. assumption/rejections motions)</b>			<b>1.50</b>		<b>2,550.00</b>
<b>B260 Board of Directors Matters</b>					
02/22/2023	JDE	Prepare for and attend board meeting (.3); correspond and conference with D. Fliman and J. Goldstein regarding same (.2).	0.50	1,600.00	800.00
<b>Subtotal: B260 Board of Directors Matters</b>			<b>0.50</b>		<b>800.00</b>
<b>B261 Investigations</b>					
02/08/2023	JDE	Prepare for and attend bi-weekly board call.	0.50	1,600.00	800.00
02/23/2023	JTG4	Review letters to court from investors.	0.40	1,700.00	680.00
<b>Subtotal: B261 Investigations</b>			<b>0.90</b>		<b>1,480.00</b>
<b>B320 Plan and Disclosure Statement (including Business Plan)</b>					
02/05/2023	JG32	Liquidating trustee analysis (.7); review and comment on plan issues (.2); discussion with S. Clements re same (.2).	1.10	1,875.00	2,062.50
02/07/2023	DF9	Review mediation updates.	0.50	1,725.00	862.50

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2356362

Page 6

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
02/07/2023	JG32	Mediation update telephone conference with Company counsel (.9); review updates regarding plan and plan documents (.4); review and respond to release questions from S. Clements (.4); review correspondence from mediation parties (.4).	2.10	1,875.00	3,937.50
02/10/2023	DF9	Correspond with PH team re plan amendments.	0.60	1,725.00	1,035.00
02/10/2023	J12	Review revised plan (.7); correspond with J. Evans re same (.2).	0.90	1,125.00	1,012.50
02/10/2023	JG32	Review and revise plan documents and related correspondence (.8); correspond with S. Clements regarding same (.3).	1.10	1,875.00	2,062.50
02/10/2023	JDE	Review and summarize amended plan.	1.10	1,600.00	1,760.00
02/13/2023	JTG4	Review recently filed plan documents (amended plan, disclosure statement, and solicitation motion).	1.50	1,700.00	2,550.00
02/14/2023	JTG4	Review exclusivity motion.	0.40	1,700.00	680.00
02/14/2023	JG32	Mediation discussion with Province (.9); telephone conference with S. Clements regarding same (.4); review pleadings regarding same (.5).	1.80	1,875.00	3,375.00
02/15/2023	DF9	Review and consider mediation update.	0.50	1,725.00	862.50
02/15/2023	JTG4	Emails with A. Alonzo and B Rosen about mediation scheduling.	0.40	1,700.00	680.00
02/17/2023	JG32	Review and consider mediation update.	0.70	1,875.00	1,312.50
02/23/2023	DF9	Correspond with PH team re plan amendments, analysis.	0.60	1,725.00	1,035.00
02/23/2023	JDE	Review and analyze comments to plan and disclosure statement (.3); correspond with PH team regarding same (.2).	0.50	1,600.00	800.00
<b>Subtotal: B320 Plan and Disclosure Statement (including Business Plan)</b>			<b>13.80</b>		<b>24,027.50</b>
<b>Total</b>			<b>35.90</b>		<b>51,698.50</b>

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2356362

Page 7

### Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
JG32	Jayne Goldstein	Partner	6.80	1,875.00	12,750.00
DF9	Dan Fliman	Partner	2.20	1,725.00	3,795.00
JTG4	James T. Grogan	Partner	12.70	1,700.00	21,590.00
JDE	Jeremy D. Evans	Of Counsel	3.10	1,600.00	4,960.00
KAT2	Katherine A. Traxler	Of Counsel	1.40	1,025.00	1,435.00
JL2	Jack Iaffaldano	Associate	3.30	1,125.00	3,712.50
ML30	Mat Laskowski	Paralegal	5.90	540.00	3,186.00
MM57	Michael Magzamen	Paralegal	0.50	540.00	270.00

### Costs incurred and advanced

<u>Date</u>	<u>Description</u>	<u>Quantity</u>	<u>Rate</u>	<u>Amount</u>
01/25/2023	Computer Search (Other)			2.70
<b>Total Costs incurred and advanced</b>				<b>\$2.70</b>

<b>Current Fees and Costs</b>	<b>\$51,701.20</b>
<b>Total Balance Due - Due Upon Receipt</b>	<b>\$51,701.20</b>

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:	)	
	)	Chapter 11
	)	
GWG Holdings, Inc., <i>et al.</i> , <sup>1</sup>	)	Case No. 22-90032 (MI)
	)	
Debtors.	)	(Jointly Administered)
	)	

**NOTICE OF FIFTH MONTHLY FEE STATEMENT OF PAUL HASTINGS LLP,  
COUNSEL TO SEAN CLEMENTS AND THE CONFLICTS COMMITTEE OF THE  
BOARD OF DIRECTORS OF GWG DLP FUNDING IV, LLC FOR THE PERIOD  
FROM MARCH 1, 2023 THROUGH MARCH 31, 2023**

Name of applicant:	Paul Hastings LLP	
Applicant's Role in the Case:	Attorneys to Sean Clements and the Conflicts Committee of the board of directors of GWG DLP Funding IV, LLC (" <u>DLP IV</u> ")	
Date Order of Employment Signed and Docket No.:	January 6, 2023 (effective as of October 31, 2022) [Docket No. 1325]	
	Beginning Date	End Date
Time period covered by this Statement:	03/01/2023	03/31/2023
Summary of Total Fees and Expenses Requested		
Total fees requested in this Statement:	\$111,001.60 (80% of 138,752.00)	
Total expenses requested in this Statement:	\$56.07	
Total fees and expenses requested in this Statement (excluding 20% holdback):	\$138,808.07	
Total fees and expenses requested in this Statement (including 20% holdback):	\$111,057.67	
Summary of Attorney Fees Requested		
Total attorney fees requested in this Statement:	\$133,190.00	

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: GWG Holdings, Inc. (2607); GWG Life, LLC (6955); GWG Life USA, LLC (5538), GWG DLP Funding IV, LLC (2589); GWG DLP Funding VI, LLC (6955); and GWG DLP Funding Holdings VI, LLC (6955). The location of Debtor GWG Holdings, Inc.'s principal place of business and the Debtors' service address is 325 N. St. Paul Street, Suite 2650 Dallas, TX 75201. Further information regarding the Debtors and these chapter 11 cases is available at the website of the Debtors' claims and noticing agent: <https://donlinrecano.com/gwg>.

Total actual attorney hours covered by this Statement:	85.80
Average hourly rate for attorneys:	\$1,552
Summary of Paraprofessional Fees Requested	
Total paraprofessional fees requested in this Statement:	\$5,562.00
Total actual paraprofessional hours covered by this Statement:	10.30
Average hourly rate for paraprofessionals:	\$540

in accordance with the *Corrected Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and (II) Granting Related Relief* [Docket No. 378] (the “Interim Compensation Order”),<sup>2</sup> Paul Hastings LLP (“Paul Hastings”) respectfully submits this fifth monthly statement (the “Monthly Statement”) and requests payment for services rendered and reimbursement of expenses incurred as counsel to Sean Clements and the Conflicts Committee of the board of directors of DLP IV in the above-captioned chapter 11 cases for the period from March 1, 2023 through and including March 31, 2023 (the “Fee Period”) in the amounts set forth above.

### **SERVICES RENDERED AND EXPENSES INCURRED**

1. Attached hereto as **Exhibit A** is a timekeeper summary that includes the name, title, department, bar admission, hourly billing rate, aggregate hours, and amount of fees earned for each Paul Hastings individual who provided services during the Fee Period.

2. Attached hereto as **Exhibit B** is a summary of Paul Hastings’ services rendered and compensation sought, by project category, for the Fee Period.

3. Attached hereto as **Exhibit C** is a summary of expenses incurred and reimbursement sought, by expense type, for the Fee Period.

4. Attached hereto as **Exhibit D** are the fee statements of Paul Hastings for services provided during the Fee Period.

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Interim Compensation Order.

### **NOTICE AND OBJECTION PROCEDURES**

1. Notice of this Monthly Statement will be given to the following parties (collectively, the “Application Recipients”): (i) the Debtors c/o GWG Holdings, Inc., 325 N. St. Paul St., Suite 2650, Dallas, TX 75201, Attn: Timothy Evans; (ii) counsel to the Debtors, Mayer Brown LLP, 71 S. Wacker Drive, Chicago, IL 60606, Attn: Thomas S. Kiriakos; (iii) co-counsel to the Debtors, Jackson Walker LLP, 1401 McKinney Street, Suite 1900, Houston, TX 77010, Attn: Kristhy M. Peguero and Matthew D. Cavanaugh; (iv) counsel to the DIP Lender, Sidley Austin LLP, One South Dearborn, Chicago, IL 60603, Attn: Matthew A. Clemente; (v) counsel to Bank of Utah in its capacity as indenture trustee for the Bonds, Akin Gump Strauss Hauer & Feld LLP, 2001 K Street NW, Washington, D.C., 20006-1037, Attn: Scott Alberino; (vi) counsel to any statutory committee appointed in these cases; and (vii) the Office of the U.S. Trustee for the Southern District of Texas, 515 Rusk Street, Suite 3516, Houston, TX 77002, Attn: Hector Duran.

2. Objections to this Monthly Statement, if any, must be served upon the Application Recipients and the undersigned counsel by or before 4:00 p.m. (CT) on the fourteenth day after service of this Monthly Statement (the “Objection Deadline”), setting forth with specificity the objectionable fees or expenses, the amount of the disputed fees or expenses, and the basis for such objection. If no objections are received by the Objection Deadline, the Debtors shall promptly pay Paul Hastings 80 percent of the fees and 100 percent of the expenses identified in this Monthly Statement.

3. To the extent that an objection to this Monthly Statement is received on or before the Objection Deadline, the Debtors shall withhold payment of that portion of this Monthly Statement to which the objection is directed and promptly pay the remainder of the fees and expenses in the percentages set forth above. To the extent such objection is not resolved,



pursuant to the procedures set forth in the Interim Compensation Order, the objecting party shall file its objection with the Court and serve the objection on the Application Recipients and the undersigned counsel. Thereafter, Paul Hastings may either (a) file with the Court a response to the objection together with a request for payment of the appropriate portion of the disputed amount or (b) preserve and schedule the disputed amount for consideration at the next interim or final fee application hearing.

4. To the extent that time or disbursement charges for services rendered or disbursements incurred relate to the Fee Period, but were not processed before the preparation of this Monthly Statement, or Paul Hastings has for any other reason not sought compensation or reimbursement with respect to such services or expenses, Paul Hastings reserves the right to request additional compensation for such services, and reimbursement of such expenses, in a supplemental or future statement.

*[Remainder of page intentionally left blank]*

Dated: May 16, 2023  
Houston, Texas

Respectfully submitted,

*/s/ James T. Grogan III*

---

**PAUL HASTINGS LLP**

James T. Grogan III (TX Bar No. 24027354)  
600 Travis Street, 58th Floor  
Houston, Texas 77002  
Telephone: (713) 860-7300  
Facsimile: (713) 353-3100  
Email: jamesgrogan@paulhastings.com

-and-

Jayme T. Goldstein (admitted *pro hac vice*)  
Daniel A Fliman (admitted *pro hac vice*)  
Allison Miller (admitted *pro hac vice*)  
Jeremy D. Evans (admitted *pro hac vice*)  
John F. Iaffaldano (admitted *pro hac vice*)  
200 Park Avenue  
New York, New York 10166  
Telephone: (212) 318-6000  
Facsimile: (212) 319-4090  
Email: jaymegoldstein@paulhastings.com

*Counsel to Sean Clements and the Conflicts Committee of  
the board of directors of DLP IV*

**Exhibit A**

**COMPENSATION BY PROFESSIONAL AND PARAPROFESSIONAL FOR FEE PERIOD**

				Total for Fee Period	
Name	Department or Group	Date of First Admission	Hourly Rate	Hours Billed	Amount
Fliman, Dan	Corporate	2003	\$1,725.00	8.30	\$14,317.50
Goldstein, Jayme	Corporate	2003	\$1,875.00	8.20	\$15,375.00
Grogan, James	Corporate	2000	\$1,700.00	24.40	\$41,480.00
Miller, Allison	Corporate	2004	\$1,725.00	6.40	\$11,040.00
<b>Total Partner:</b>				<b>47.30</b>	<b>\$82,212.50</b>
Evans, Jeremy	Corporate	2013	\$1,600.00	22.50	\$36,000.00
Evans, Jeremy (Travel)	Corporate	2013	\$800.00 (Bill at ½ rate)	9.30	\$7,440.00
<b>Total Counsel:</b>				<b>31.80</b>	<b>\$43,440.00</b>
Iaffaldano, Jack	Corporate	2020	\$1,125.00	6.70	\$7,537.50
<b>Total Associate:</b>				<b>6.70</b>	<b>\$7,537.50</b>
Laskowski, Mat	Paralegal		\$540.00	7.50	\$4,050.00
Magzamen, Michel	Paralegal		\$540.00	2.80	\$1,512.00
<b>Total Paraprofessional:</b>				<b>10.30</b>	<b>\$5,562.00</b>
<b>Total:</b>				<b>96.10</b>	<b>\$138,752.00</b>

**Exhibit B**

**COMPENSATION BY PROJECT CATEGORY FOR FEE PERIOD**

		Total for Fee Period	
U.S. Trustee Task Code and Project Category		Total Hours	Total Fees
B110	Case Administration	4.40	\$6,639.50
B113	Pleadings Review	11.40	\$12,284.00
B155	Court Hearings	21.00	\$32,366.50
B160	Employment / Fee Applications (Paul Hastings)	6.20	\$6,367.00
B191	General Litigation	0.40	\$680.00
B195	Non-Working Travel	9.30	\$7,440.00
B210	Business Operations	0.20	\$340.00
B260	Board of Directors Matters	3.70	\$5,397.50
B320	Plan and Disclosure Statement	39.50	\$67,237.50
<b>TOTAL</b>		<b>96.10</b>	<b>\$138,752.00</b>

**Exhibit C**

**EXPENSE SUMMARY FOR FEE PERIOD**

Category	Total for Fee Period
Computer Search	\$20.97
Courier Service	\$35.10
<b>TOTAL</b>	<b>\$56.07</b>

**Exhibit D**

**FEE STATEMENTS FOR FEE PERIOD**



**PAUL HASTINGS LLP**  
200 Park Avenue, New York, NY 10166-3205  
t: +1.212.318.6000 | f: +1.212.319.4090 | [www.paulhastings.com](http://www.paulhastings.com)

Conflicts Committee of GWG DLP Funding IV, LLC  
Suite 1200  
220 South Sixth Street  
Minneapolis, MN 55402

May 3, 2023

Please Refer to  
Invoice Number: 2356717

Attn: Sean Clements

PH LLP Tax ID No. 95-2209675

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## SUMMARY SHEET

### **Bankruptcy Case**

PH LLP Client/Matter # 51132-00002  
Jayme Goldstein

Legal fees for professional services for the period ending March 31, 2023	\$138,752.00
Costs incurred and advanced	56.07
<b>Current Fees and Costs Due</b>	<b>\$138,808.07</b>
<b>Total Balance Due - Due Upon Receipt</b>	<b>\$138,808.07</b>

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

***TO PROTECT AGAINST FRAUD***, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Teri Goffredo @ 213-683-5045 or via email @ [terigoffredo@paulhastings.com](mailto:terigoffredo@paulhastings.com) and requesting written and verbal confirmation.

For wires, please reference the invoice, client and matter number(s) being paid  
For ACH payments, please use the CTX format and/or send any remittances to [cashepn@paulhastings.com](mailto:cashepn@paulhastings.com) This is a no-reply mailbox  
Please refer all questions to [billing@paulhastings.com](mailto:billing@paulhastings.com)



**PAUL HASTINGS LLP**  
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t: +1.212.318.6000 | f: +1.212.319.4090 | [www.paulhastings.com](http://www.paulhastings.com)

Conflicts Committee of GWG DLP Funding IV, LLC May 3, 2023

Suite 1200

220 South Sixth Street

Minneapolis, MN 55402

Please Refer to

Invoice Number: 2356717

Attn: Sean Clements

PH LLP Tax ID No. 95-2209675

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### REMITTANCE COPY

#### **Bankruptcy Case**

PH LLP Client/Matter # 51132-00002

Jayne Goldstein

Legal fees for professional services

for the period ending March 31, 2023

\$138,752.00

Costs incurred and advanced

56.07

**Current Fees and Costs Due**

**\$138,808.07**

**Total Balance Due - Due Upon Receipt**

**\$138,808.07**

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We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

***TO PROTECT AGAINST FRAUD***, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Teri Goffredo @ 213-683-5045 or via email @ [terigoffredo@paulhastings.com](mailto:terigoffredo@paulhastings.com) and requesting written and verbal confirmation.

For wires, please reference the invoice, client and matter number(s) being paid

For ACH payments, please use the CTX format and/or send any remittances to [cashepn@paulhastings.com](mailto:cashepn@paulhastings.com) This is a no-reply mailbox

Please refer all questions to [billing@paulhastings.com](mailto:billing@paulhastings.com)





**PAUL HASTINGS LLP**  
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t: +1.212.318.6000 | f: +1.212.319.4090 | www.paulhastings.com

Conflicts Committee of GWG DLP Funding IV, LLC May 3, 2023  
Suite 1200  
220 South Sixth Street  
Minneapolis, MN 55402

Please Refer to  
Invoice Number: 2356717

Attn: Sean Clements

PH LLP Tax ID No. 95-2209675

FOR PROFESSIONAL SERVICES RENDERED  
for the period ending March 31, 2023

**Bankruptcy Case** **\$138,752.00**

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>B110 Case Administration</b>					
03/08/2023	JTG4	Email with M. Laskowski re case update	0.20	1,700.00	340.00
03/09/2023	JTG4	Email with M. Laskowski re case update	0.30	1,700.00	510.00
03/10/2023	JTG4	Email with M. Laskowski re case update	0.20	1,700.00	340.00
03/11/2023	JG32	Review case status and updates	0.50	1,875.00	937.50
03/13/2023	JTG4	Email with M. Laskowski re case update	0.10	1,700.00	170.00
03/15/2023	JTG4	Email with M. Laskowski about case update	0.20	1,700.00	340.00
03/16/2023	JTG4	Email with M. Laskowski about case update	0.20	1,700.00	340.00
03/17/2023	JTG4	Review case update from M. Laskowski	0.20	1,700.00	340.00
03/20/2023	JTG4	Email with M. Laskowski re case update	0.20	1,700.00	340.00
03/21/2023	JTG4	Email with M. Laskowski re case update	0.20	1,700.00	340.00
03/22/2023	JTG4	Email with M. Laskowski re case update	0.30	1,700.00	510.00
03/23/2023	JTG4	Email with M. Laskowski re case update	0.10	1,700.00	170.00
03/24/2023	JTG4	Email with M. Laskowski re case update	0.20	1,700.00	340.00
03/25/2023	JTG4	Email with M. Laskowski re case update	0.20	1,700.00	340.00
03/25/2023	ML30	Review filing notices (.1); obtain new pleadings (.2); circulate (.1)	0.40	540.00	216.00

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2356717

Page 2

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/27/2023	ML30	Update case calendars (.2); correspond with J. Iaffaldano re 3.28.23 hearing needs (.2)	0.40	540.00	216.00
03/29/2023	JTG4	Email with M. Laskowski re case update	0.20	1,700.00	340.00
03/30/2023	JTG4	Email with M. Laskowski re case update	0.20	1,700.00	340.00
03/31/2023	JTG4	Email with M. Laskowski re case update	0.10	1,700.00	170.00
<b>Subtotal: B110 Case Administration</b>			<b>4.40</b>		<b>6,639.50</b>

**B113 Pleadings Review**

03/01/2023	JTG4	Email with M. Laskowski re docket update (.1); review recent pleadings (.3)	0.40	1,700.00	680.00
03/01/2023	ML30	Review recent docket filings and update working group re same	0.20	540.00	108.00
03/02/2023	JTG4	Email with M. Laskowski re docket update (.1); review recent pleadings (.2)	0.30	1,700.00	510.00
03/02/2023	ML30	Review recent docket filings and update working group re same	0.20	540.00	108.00
03/03/2023	JTG4	Email with M. Laskowski re docket update (.1); review recent pleadings (.3)	0.40	1,700.00	680.00
03/03/2023	ML30	Review recent docket filings and update working group re same	0.20	540.00	108.00
03/06/2023	JTG4	Email with M. Laskowski re docket update (.1); review ECF notices (.2); review recent pleadings (.2)	0.50	1,700.00	850.00
03/06/2023	ML30	Review recent docket filings and update working group re same	0.20	540.00	108.00
03/07/2023	JTG4	Email with M. Laskowski re docket update	0.20	1,700.00	340.00
03/07/2023	ML30	Review recent docket filings and update working group re same	0.20	540.00	108.00
03/08/2023	JTG4	Review ECF notices and recent pleadings	0.40	1,700.00	680.00
03/08/2023	ML30	Review recent docket filings and update working group and case calendars re same	0.30	540.00	162.00
03/09/2023	JTG4	Review ECF notices	0.30	1,700.00	510.00

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2356717

Page 3

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/09/2023	ML30	Review recent docket filings and update working group re same	0.20	540.00	108.00
03/10/2023	JTG4	Review ECF notices and recent pleadings	0.20	1,700.00	340.00
03/10/2023	ML30	Review recent docket filings and update working group re same	0.20	540.00	108.00
03/13/2023	JTG4	Review ECF notices and recent pleadings	0.20	1,700.00	340.00
03/13/2023	ML30	Monitor the docket and prepare end of day update re recent filings for working group	0.20	540.00	108.00
03/14/2023	ML30	Monitor the docket and prepare end of day update re recent filings for working group	0.20	540.00	108.00
03/15/2023	JTG4	Review ECF notices	0.30	1,700.00	510.00
03/15/2023	ML30	Monitor the docket and prepare end of day update re recent filings for working group	0.20	540.00	108.00
03/16/2023	ML30	Monitor the docket and prepare end of day update re recent filings for working group	0.30	540.00	162.00
03/17/2023	ML30	Monitor the docket and prepare end of day update re recent filings for working group	0.30	540.00	162.00
03/20/2023	JTG4	Review ECF notices	0.30	1,700.00	510.00
03/20/2023	ML30	Monitor the docket and prepare end of day update for working group re same	0.30	540.00	162.00
03/21/2023	JTG4	Review ECF notices and recent pleadings	0.40	1,700.00	680.00
03/21/2023	JDE	Review chapter 11 docket	0.20	1,600.00	320.00
03/21/2023	ML30	Monitor the docket and prepare end of day update for working group re same	0.20	540.00	108.00
03/22/2023	ML30	Review recent filings (.2); monitor the docket and prepare end of day update for working group re same (.2)	0.40	540.00	216.00
03/23/2023	ML30	Monitor the docket and prepare end of day update for working group re same	0.20	540.00	108.00
03/24/2023	JTG4	Review ECF notices and recent pleadings	0.30	1,700.00	510.00
03/24/2023	ML30	Monitor the docket and prepare end of day update for working group re same (.2); review new filings (.3).	0.50	540.00	270.00
03/27/2023	JTG4	Review ECF notices	0.70	1,700.00	1,190.00

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2356717

Page 4

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/27/2023	ML30	Review recent filings and prepare end of day update for working group	0.40	540.00	216.00
03/28/2023	ML30	Review recent filings and prepare end of day update for working group	0.40	540.00	216.00
03/29/2023	ML30	Review recent filings and update working group and case calendars re same	0.30	540.00	162.00
03/30/2023	ML30	Review recent filings and update working group re same	0.20	540.00	108.00
03/31/2023	JTG4	Review ECF notices and recent pleadings	0.20	1,700.00	340.00
03/31/2023	ML30	Review recent filings and update working group re same	0.30	540.00	162.00
<b>Subtotal: B113 Pleadings Review</b>			<b>11.40</b>		<b>12,284.00</b>

**B155 Court Hearings**

03/17/2023	JTG4	Review hearing agenda	0.10	1,700.00	170.00
03/17/2023	ML30	Correspond with J. Iaffaldano re 3.20.23 hearing needs	0.20	540.00	108.00
03/20/2023	J12	Monitor hearing	0.80	1,125.00	900.00
03/20/2023	JTG4	Attend status conference on plan settlement and disclosure statement scheduling (.8); prepare follow up notes regarding same (.1)	0.90	1,700.00	1,530.00
03/20/2023	JDE	Attend status conference on plan settlement and disclosure statement (0.8); correspond with J. Goldstein and S. Clements regarding same (0.4).	1.20	1,600.00	1,920.00
03/20/2023	ML30	Correspond with J. Iaffaldano re 3.20.23 hearing needs	0.20	540.00	108.00
03/21/2023	ML30	Correspond with J. Iaffaldano re 3.23.23 hearing needs	0.20	540.00	108.00
03/23/2023	JTG4	Attend hearing on discovery dispute with Fifth Season	1.40	1,700.00	2,380.00
03/23/2023	JDE	Attend hearing on discovery dispute with Fifth Season(1.4); follow up review of related issues (.1)	1.50	1,600.00	2,400.00

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2356717

Page 5

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/28/2023	Jl2	Monitor part of disclosure statement hearing	1.50	1,125.00	1,687.50
03/28/2023	JTG4	Review pleadings in advance of disclosure statement hearing (2.8); attend disclosure statement hearing (2.2)	5.00	1,700.00	8,500.00
03/28/2023	JTG4	Post-hearing meeting with S. Clements and J. Evans regarding case updates and strategy	1.30	1,700.00	2,210.00
03/28/2023	JDE	Attend disclosure statement hearing (2.2); post-hearing meeting with S. Clements, J. Grogan regarding strategy and next steps (1.3); prepare notes regarding same (.2)	3.70	1,600.00	5,920.00
03/31/2023	Jl2	Monitor disclosure statement hearing.	1.00	1,125.00	1,125.00
03/31/2023	JTG4	Attend status conference on disclosure statement schedule and related issues	1.00	1,700.00	1,700.00
03/31/2023	JDE	Attend continued disclosure statement hearing.	1.00	1,600.00	1,600.00
<b>Subtotal: B155 Court Hearings</b>			<b>21.00</b>		<b>32,366.50</b>

**B160 Fee/Employment Applications**

03/03/2023	MM57	Confer w/ J. Iaffaldano re: first interim fee app (.1); draft interim fee app (.5)	0.60	540.00	324.00
03/06/2023	MM57	Draft interim fee application; confer w/ C. Edge re: same	1.00	540.00	540.00
03/07/2023	MM57	Follow-up w/ C. Edge (Finance) re: first interim fee app and confirm numbers	0.40	540.00	216.00
03/08/2023	MM57	Review and revise first interim fee application (.4); email to J. Iaffaldano re: same (.1)	0.50	540.00	270.00
03/13/2023	DF9	Review and comment on PH fee matters	0.50	1,725.00	862.50
03/14/2023	DF9	Further review and comment on PH fee matters	0.50	1,725.00	862.50
03/29/2023	JDE	Begin review of PH fee application.	0.30	1,600.00	480.00
03/31/2023	Jl2	Draft interim fee application (1.4); emails with D. Fliman and J. Grogan re same (.2)	1.60	1,125.00	1,800.00

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2356717

Page 6

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/31/2023	JTG4	Emails with D. Fliman and J. Iaffaldano re interim fee application (.2); review same (.3)	0.50	1,700.00	850.00
03/31/2023	MM57	Confer w/ J. Iaffaldano, J. Grogan and D. Fliman re: first interim fee application (.1); e-file same (.2)	0.30	540.00	162.00
<b>Subtotal: B160 Fee/Employment Applications</b>			<b>6.20</b>		<b>6,367.00</b>
<b>B191 General Litigation</b>					
03/22/2023	JTG4	Review statement regarding Fifth Season subpoena	0.40	1,700.00	680.00
<b>Subtotal: B191 General Litigation</b>			<b>0.40</b>		<b>680.00</b>
<b>B195 Non-Working Travel</b>					
03/27/2023	JDE	Travel from New York to Houston for disclosure statement hearing (Bill at 1/2 rate)	4.00	800.00	3,200.00
03/29/2023	JDE	Travel from Houston to New York after disclosure statement hearing (Bill at 1/2 rate)	5.30	800.00	4,240.00
<b>Subtotal: B195 Non-Working Travel</b>			<b>9.30</b>		<b>7,440.00</b>
<b>B210 Business Operations</b>					
03/25/2023	JTG4	Review hearing notice on insurance defense costs	0.20	1,700.00	340.00
<b>Subtotal: B210 Business Operations</b>			<b>0.20</b>		<b>340.00</b>
<b>B260 Board of Directors Matters</b>					
03/01/2023	Jl2	Prepare director monthly invoice (.3); email Mayer Brown re same (.2).	0.50	1,125.00	562.50

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2356717

Page 7

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/08/2023	JDE	Prepare notes for and attend board meeting	0.50	1,600.00	800.00
03/22/2023	J12	Attend DLP IV board meeting with J. Evans re plan and disclosure statement updates (.3); emails with J. Evans re same (.3).	0.60	1,125.00	675.00
03/22/2023	JDE	Prepare for and attend weekly board meeting with J. Iaffaldano (1.0); review amended plan and disclosure statement regarding same (1.0); call with client regarding same (0.1).	2.10	1,600.00	3,360.00
<b>Subtotal: B260 Board of Directors Matters</b>			<b>3.70</b>		<b>5,397.50</b>

**B320 Plan and Disclosure Statement (including Business Plan)**

03/08/2023	AM50	Attention to various updates re plan (.9); liaise with D. Fliman on same (.3); respond to emails with internal team re same (.3).	1.30	1,725.00	2,242.50
03/08/2023	DF9	Correspond with J. Evans re mediation terms (1.2); calls with case parties re same (.5); correspond with Mayer Brown re plan terms (.8).	2.50	1,725.00	4,312.50
03/08/2023	JTG4	Correspond with J. Evans regarding disclosure statement hearing rescheduling	0.20	1,700.00	340.00
03/08/2023	JG32	Review and comment on settlement documents and release issues	1.30	1,875.00	2,437.50
03/08/2023	JDE	Review and analyze draft mediation agreement (1.7); correspond with D. Fliman regarding same (.6).	2.30	1,600.00	3,680.00
03/11/2023	JTG4	Review mediation statement	0.20	1,700.00	340.00
03/11/2023	JG32	Review and comment on documents regarding releases and related issues	0.60	1,875.00	1,125.00
03/13/2023	JDE	Review and summarize mediation statement	0.60	1,600.00	960.00
03/14/2023	AM50	Review summary of plan changes by J. Evans (.6); discussions internally on same (.2); review amended Plan re: releases (.4).	1.20	1,725.00	2,070.00
03/14/2023	JTG4	Review bondholder letters to Court	0.50	1,700.00	850.00

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2356717

Page 8

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/14/2023	JDE	Review and analyze draft amended plan (1.1); correspond with J. Goldstein, company counsel regarding same (1.4)	2.50	1,600.00	4,000.00
03/15/2023	AM50	Participate on update call with D. Fliman and J. Evans regarding plan releases.	1.00	1,725.00	1,725.00
03/15/2023	DF9	Correspond with J. Evans, J. Grogan re disclosure statement hearing (.8); assess disclosure statement and plan issues/tasks (.5).	1.30	1,725.00	2,242.50
03/15/2023	J12	Call with J. Evans re plan and disclosure statement issues (.5); emails with J. Evans re same (.2)	0.70	1,125.00	787.50
03/15/2023	JTG4	Emails with J. Evans regarding disclosure statement hearing	0.40	1,700.00	680.00
03/15/2023	JDE	Review and analyze amended plan (1.2); prepare for and attend call with company advisors regarding same (1.2); summarize company advisor call for J. Goldstein, J. Iaffaldano (0.7); call with J. Iaffaldano regarding same (0.5).	3.60	1,600.00	5,760.00
03/16/2023	AM50	Follow up with J. Evans regarding Plan and associated releases for DLP IV directors (.5); review proposed provisions (.7).	1.20	1,725.00	2,070.00
03/16/2023	DF9	Assess plan provisions (1.1); correspond with PH team re same (0.5); correspond with Akin re plan provisions (.6).	2.20	1,725.00	3,795.00
03/16/2023	JTG4	Review scheduling update for disclosure statement hearing	0.30	1,700.00	510.00
03/16/2023	JDE	Review and analyze draft amended plan (1.1); correspond with D. Fliman, J. Goldstein regarding same (1.4).	2.50	1,600.00	4,000.00
03/17/2023	AM50	Follow up regarding Plan releases and update.	0.50	1,725.00	862.50
03/17/2023	DF9	Assess plan provisions (.5); correspond with J. Evans, J. Goldstein re same (.3).	0.80	1,725.00	1,380.00
03/17/2023	JTG4	Correspond with J. Evans regarding disclosure statement hearing rescheduling	0.20	1,700.00	340.00



Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2356717

Page 9

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/17/2023	JG32	Analyze release matters (.4); correspond with D. Fliman and J. Evans related to same (.3); review related documents (.6)	1.30	1,875.00	2,437.50
03/17/2023	JDE	Review and comment on amended plan.	0.50	1,600.00	800.00
03/20/2023	JG32	Correspond with J. Evans and S. Clements regarding disclosure statement hearing (.8); review and comment on disclosure statement and release issues (.4); client discussions regarding same (.4)	1.60	1,875.00	3,000.00
03/22/2023	JTG4	Review amended plan and disclosure statement	1.80	1,700.00	3,060.00
03/23/2023	JG32	Review and comment on plan, release matters, and related plan documents (.7); review disclosure statement hearing updates (.5); telephone conference with client to discuss same (.4)	1.60	1,875.00	3,000.00
03/25/2023	JTG4	Review and calendar disclosure statement hearing notice	0.20	1,700.00	340.00
03/27/2023	JTG4	Review Hepner objection to disclosure statement (.3); review modified plan (.7); review summary of bondholder treatment (.3)	1.30	1,700.00	2,210.00
03/28/2023	AM50	Attention to disclosure statement hearing (.8); attention to J. Evans emails on same (.6).	1.20	1,725.00	2,070.00
03/28/2023	DF9	Review updates re disclosure statement hearing.	0.50	1,725.00	862.50
03/28/2023	JG32	Review and analyze disclosure statement and related plan issues (.9); discussion with client regarding same (.4)	1.30	1,875.00	2,437.50
03/31/2023	JTG4	Review disclosure statement scheduling order and calendar same	0.30	1,700.00	510.00
<b>Subtotal: B320 Plan and Disclosure Statement (including Business Plan)</b>			<b>39.50</b>		<b>67,237.50</b>
<b>Total</b>			<b>96.10</b>		<b>138,752.00</b>

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2356717

Page 10

### Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
JG32	Jayne Goldstein	Partner	8.20	1,875.00	15,375.00
AM50	Allison Miller	Partner	6.40	1,725.00	11,040.00
DF9	Dan Fliman	Partner	8.30	1,725.00	14,317.50
JTG4	James T. Grogan	Partner	24.40	1,700.00	41,480.00
JDE	Jeremy D. Evans	Of Counsel	22.50	1,600.00	36,000.00
JDE	Jeremy D. Evans	Of Counsel	9.30	800.00	7,440.00
JI2	Jack Iaffaldano	Associate	6.70	1,125.00	7,537.50
ML30	Mat Laskowski	Paralegal	7.50	540.00	4,050.00
MM57	Michael Magzamen	Paralegal	2.80	540.00	1,512.00

### Costs incurred and advanced

<u>Date</u>	<u>Description</u>	<u>Quantity</u>	<u>Rate</u>	<u>Amount</u>
03/06/2023	UPS/Courier Service - UPS (USD)(JPMPCARD); Invoice # 00000930543103; 03/06/2023; K. Traxler; 1Z9305430193126507 (MAN)			35.10
03/06/2023	Computer Search (Other)			20.97
<b>Total Costs incurred and advanced</b>				<b>\$56.07</b>

**Current Fees and Costs** **\$138,808.07**

**Total Balance Due - Due Upon Receipt** **\$138,808.07**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:	)	
	)	Chapter 11
	)	
GWG Holdings, Inc., <i>et al.</i> , <sup>1</sup>	)	Case No. 22-90032 (MI)
	)	
Debtors.	)	(Jointly Administered)
	)	

**NOTICE OF SIXTH MONTHLY FEE STATEMENT OF PAUL HASTINGS LLP,  
COUNSEL TO SEAN CLEMENTS AND THE CONFLICTS COMMITTEE OF THE  
BOARD OF DIRECTORS OF GWG DLP FUNDING IV, LLC FOR THE PERIOD  
FROM APRIL 1, 2023 THROUGH APRIL 30, 2023**

Name of applicant:	Paul Hastings LLP	
Applicant’s Role in the Case:	Attorneys to Sean Clements and the Conflicts Committee of the board of directors of GWG DLP Funding IV, LLC (“DLP IV”)	
Date Order of Employment Signed and Docket No.:	January 6, 2023 (effective as of October 31, 2022) [Docket No. 1325]	
	Beginning Date	End Date
Time period covered by this Statement:	04/01/2023	04/30/2023
Summary of Total Fees and Expenses Requested		
Total fees requested in this Statement:	\$60,913.60 (80% of 76,142.00)	
Total expenses requested in this Statement:	\$2,107.59	
Total fees and expenses requested in this Statement (excluding 20% holdback):	\$78,249.59	
Total fees and expenses requested in this Statement (including 20% holdback):	\$63,021.19	
Summary of Attorney Fees Requested		
Total attorney fees requested in this Statement:	\$72,200.00	

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: GWG Holdings, Inc. (2607); GWG Life, LLC (6955); GWG Life USA, LLC (5538), GWG DLP Funding IV, LLC (2589); GWG DLP Funding VI, LLC (6955); and GWG DLP Funding Holdings VI, LLC (6955). The location of Debtor GWG Holdings, Inc.'s principal place of business and the Debtors' service address is 325 N. St. Paul Street, Suite 2650 Dallas, TX 75201. Further information regarding the Debtors and these chapter 11 cases is available at the website of the Debtors' claims and noticing agent: <https://donlinrecano.com/gwg>.

Total actual attorney hours covered by this Statement:	48.90
Average hourly rate for attorneys:	\$1,476
Summary of Paraprofessional Fees Requested	
Total paraprofessional fees requested in this Statement:	\$3,942.00
Total actual paraprofessional hours covered by this Statement:	7.30
Average hourly rate for paraprofessionals:	\$540

In accordance with the *Corrected Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and (II) Granting Related Relief* [Docket No. 378] (the “Interim Compensation Order”),<sup>2</sup> Paul Hastings LLP (“Paul Hastings”) respectfully submits this fifth monthly statement (the “Monthly Statement”) and requests payment for services rendered and reimbursement of expenses incurred as counsel to Sean Clements and the Conflicts Committee of the board of directors of DLP IV in the above-captioned chapter 11 cases for the period from April 1, 2023 through and including April 30, 2023 (the “Fee Period”) in the amounts set forth above.

### **SERVICES RENDERED AND EXPENSES INCURRED**

1. Attached hereto as **Exhibit A** is a timekeeper summary that includes the name, title, department, bar admission, hourly billing rate, aggregate hours, and amount of fees earned for each Paul Hastings individual who provided services during the Fee Period.

2. Attached hereto as **Exhibit B** is a summary of Paul Hastings’ services rendered and compensation sought, by project category, for the Fee Period.

3. Attached hereto as **Exhibit C** is a summary of expenses incurred and reimbursement sought, by expense type, for the Fee Period.

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<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Interim Compensation Order.

4. Attached hereto as **Exhibit D** are the fee statements of Paul Hastings for services provided during the Fee Period.

### **NOTICE AND OBJECTION PROCEDURES**

1. Notice of this Monthly Statement will be given to the following parties (collectively, the “Application Recipients”): (i) the Debtors c/o GWG Holdings, Inc., 325 N. St. Paul St., Suite 2650, Dallas, TX 75201, Attn: Timothy Evans; (ii) counsel to the Debtors, Mayer Brown LLP, 71 S. Wacker Drive, Chicago, IL 60606, Attn: Thomas S. Kiriakos; (iii) co-counsel to the Debtors, Jackson Walker LLP, 1401 McKinney Street, Suite 1900, Houston, TX 77010, Attn: Kristhy M. Peguero and Matthew D. Cavanaugh; (iv) counsel to the DIP Lender, Sidley Austin LLP, One South Dearborn, Chicago, IL 60603, Attn: Matthew A. Clemente; (v) counsel to Bank of Utah in its capacity as indenture trustee for the Bonds, Akin Gump Strauss Hauer & Feld LLP, 2001 K Street NW, Washington, D.C., 20006-1037, Attn: Scott Alberino; (vi) counsel to any statutory committee appointed in these cases; and (vii) the Office of the U.S. Trustee for the Southern District of Texas, 515 Rusk Street, Suite 3516, Houston, TX 77002, Attn: Hector Duran.

2. Objections to this Monthly Statement, if any, must be served upon the Application Recipients and the undersigned counsel by or before 4:00 p.m. (CT) on the fourteenth day after service of this Monthly Statement (the “Objection Deadline”), setting forth with specificity the objectionable fees or expenses, the amount of the disputed fees or expenses, and the basis for such objection. If no objections are received by the Objection Deadline, the Debtors shall promptly pay Paul Hastings 80 percent of the fees and 100 percent of the expenses identified in this Monthly Statement.

3. To the extent that an objection to this Monthly Statement is received on or before the Objection Deadline, the Debtors shall withhold payment of that portion of this Monthly

Statement to which the objection is directed and promptly pay the remainder of the fees and expenses in the percentages set forth above. To the extent such objection is not resolved, pursuant to the procedures set forth in the Interim Compensation Order, the objecting party shall file its objection with the Court and serve the objection on the Application Recipients and the undersigned counsel. Thereafter, Paul Hastings may either (a) file with the Court a response to the objection together with a request for payment of the appropriate portion of the disputed amount or (b) preserve and schedule the disputed amount for consideration at the next interim or final fee application hearing.

4. To the extent that time or disbursement charges for services rendered or disbursements incurred relate to the Fee Period, but were not processed before the preparation of this Monthly Statement, or Paul Hastings has for any other reason not sought compensation or reimbursement with respect to such services or expenses, Paul Hastings reserves the right to request additional compensation for such services, and reimbursement of such expenses, in a supplemental or future statement.

*[Remainder of page intentionally left blank]*

Dated: July 7, 2023  
Houston, Texas

Respectfully submitted,

/s/ James T. Grogan III

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**PAUL HASTINGS LLP**

James T. Grogan III (TX Bar No. 24027354)  
600 Travis Street, 58th Floor  
Houston, Texas 77002  
Telephone: (713) 860-7300  
Facsimile: (713) 353-3100  
Email: jamesgrogan@paulhastings.com

-and-

Jayme T. Goldstein (admitted *pro hac vice*)  
Daniel A Fliman (admitted *pro hac vice*)  
Allison Miller (admitted *pro hac vice*)  
Jeremy D. Evans (admitted *pro hac vice*)  
John F. Iaffaldano (admitted *pro hac vice*)  
200 Park Avenue  
New York, New York 10166  
Telephone: (212) 318-6000  
Facsimile: (212) 319-4090  
Email: jaymegoldstein@paulhastings.com

*Counsel to Sean Clements and the Conflicts Committee of  
the board of directors of DLP IV*

**Exhibit A**

**COMPENSATION BY PROFESSIONAL AND PARAPROFESSIONAL FOR FEE PERIOD**

				Total for Fee Period	
Name	Department or Group	Date of First Admission	Hourly Rate	Hours Billed	Amount
Goldstein, Jayme	Corporate	2003	\$1,875.00	8.70	\$16,312.50
Grogan, James	Corporate	2000	\$1,700.00	21.40	\$36,380.00
Miller, Allison	Corporate	2004	\$1,725.00	1.10	\$1,897.50
<b>Total Partner:</b>				<b>31.20</b>	<b>\$54,590.00</b>
Evans, Jeremy	Corporate	2013	\$1,600.00	2.90	\$4,640.00
Evans, Jeremy (Travel)	Corporate	2013	\$800.00 (Bill at ½ rate)	8.00	\$6,400.00
<b>Total Counsel:</b>				<b>10.90</b>	<b>\$11,040.00</b>
Iaffaldano, Jack	Corporate	2020	\$1,125.00	2.80	\$3,150.00
Thomas, Schlea	Corporate	2022	\$855.00	4.00	\$3,420.00
<b>Total Associate:</b>				<b>6.80</b>	<b>\$6,570.00</b>
Laskowski, Mat	Paralegal		\$540.00	6.30	\$3,402.00
Magzamen, Michel	Paralegal		\$540.00	1.00	\$540.00
<b>Total Paraprofessional:</b>				<b>7.30</b>	<b>\$3,942.00</b>
<b>Total:</b>				<b>56.20</b>	<b>\$76,142.00</b>



**Exhibit B**

**COMPENSATION BY PROJECT CATEGORY FOR FEE PERIOD**

		Total for Fee Period	
U.S. Trustee Task Code and Project Category		Total Hours	Total Fees
B110	Case Administration	4.30	\$7,078.00
B113	Pleadings Review	13.80	\$16,667.50
B155	Court Hearings	12.10	\$17,127.00
B160	Employment / Fee Applications (Paul Hastings)	5.90	\$7,729.50
B195	Non-Working Travel	8.00	\$6,400.00
B211	Financial Reports (Monthly Operating Reports)	0.50	\$850.00
B260	Board of Directors Matters	0.50	\$562.50
B320	Plan and Disclosure Statement	11.10	\$19,727.50
<b>TOTAL</b>		<b>56.20</b>	<b>\$76,142.00</b>

**Exhibit C**

**EXPENSE SUMMARY FOR FEE PERIOD**

Category	Total for Fee Period
Computer Search	\$2.25
Airfare	\$467.80
Lodging	\$1,162.30
Taxi/Ground Transportation	\$366.01
Meals	\$109.23
<b>TOTAL</b>	<b>\$2,107.59</b>

**Exhibit D**

**FEE STATEMENTS FOR FEE PERIOD**



**PAUL HASTINGS LLP**  
200 Park Avenue, New York, NY 10166-3205  
t: +1.212.318.6000 | f: +1.212.319.4090 | [www.paulhastings.com](http://www.paulhastings.com)

Conflicts Committee of GWG DLP Funding IV, LLC June 12, 2023  
Suite 1200  
220 South Sixth Street  
Minneapolis, MN 55402

Please Refer to  
Invoice Number: 2361261

Attn: Sean Clements

PH LLP Tax ID No. 95-2209675

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## SUMMARY SHEET

### Bankruptcy Case

PH LLP Client/Matter # 51132-00002  
Jayme Goldstein

Legal fees for professional services for the period ending April 30, 2023	\$76,142.00
Costs incurred and advanced	2,107.59
<b>Current Fees and Costs Due</b>	<b>\$78,249.59</b>
<b>Total Balance Due - Due Upon Receipt</b>	<b>\$78,249.59</b>

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

***TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Teri Goffredo @ 213-683-5045 or via email @ [terigoffredo@paulhastings.com](mailto:terigoffredo@paulhastings.com) and requesting written and verbal confirmation.***

### Wiring and ACH Instructions:

Citibank  
ABA # 322271724  
SWIFT Address: CITIUS33  
787 W. 5th Street  
Los Angeles, CA 90071  
Account Number: 206628380  
Account Name: Paul Hastings LLP

### Remittance Address:

Paul Hastings LLP  
Lockbox 4803  
PO Box 894803  
Los Angeles, CA 90189-4803

For wires, please reference the invoice, client and matter number(s) being paid  
For ACH payments, please use the CTX format and/or send any remittances to [cashepn@paulhastings.com](mailto:cashepn@paulhastings.com). This is a no-reply mailbox  
Please refer all questions to [billing@paulhastings.com](http://billing@paulhastings.com)



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200 Park Avenue, New York, NY 10166-3205  
t: +1.212.318.6000 | f: +1.212.319.4090 | [www.paulhastings.com](http://www.paulhastings.com)

Conflicts Committee of GWG DLP Funding IV, LLC June 12, 2023  
Suite 1200  
220 South Sixth Street  
Minneapolis, MN 55402

Please Refer to  
Invoice Number: 2361261

Attn: Sean Clements

PH LLP Tax ID No. 95-2209675

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### REMITTANCE COPY

#### **Bankruptcy Case**

PH LLP Client/Matter # 51132-00002  
Jayme Goldstein

Legal fees for professional services for the period ending April 30, 2023	\$76,142.00
Costs incurred and advanced	2,107.59
<b>Current Fees and Costs Due</b>	<b>\$78,249.59</b>
<b>Total Balance Due - Due Upon Receipt</b>	<b>\$78,249.59</b>

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#### **Remittance Address:**

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For wires, please reference the invoice, client and matter number(s) being paid  
For ACH payments, please use the CTX format and/or send any remittances to [cashepn@paulhastings.com](mailto:cashepn@paulhastings.com). This is a no-reply mailbox  
Please refer all questions to [billing@paulhastings.com](http://billing@paulhastings.com)



**PAUL HASTINGS LLP**  
200 Park Avenue, New York, NY 10166-3205  
t: +1.212.318.6000 | f: +1.212.319.4090 | www.paulhastings.com

Conflicts Committee of GWG DLP Funding IV, LLC June 12, 2023  
Suite 1200  
220 South Sixth Street  
Minneapolis, MN 55402

Please Refer to  
Invoice Number: 2361261

Attn: Sean Clements

PH LLP Tax ID No. 95-2209675

FOR PROFESSIONAL SERVICES RENDERED  
for the period ending April 30, 2023

**Bankruptcy Case** **\$76,142.00**

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>B110 Case Administration</b>					
04/03/2023	JTG4	Email with M. Laskowski re case update	0.20	1,700.00	340.00
04/04/2023	JTG4	Email with M. Laskowski re case update	0.20	1,700.00	340.00
04/05/2023	JTG4	Email with M. Laskowski re case update	0.20	1,700.00	340.00
04/06/2023	JTG4	Email with M. Laskowski re case update	0.20	1,700.00	340.00
04/07/2023	JTG4	Email with M. Laskowski re case update (.2); review case calendar (.2)	0.40	1,700.00	680.00
04/10/2023	JTG4	Email with M. Laskowski re case update	0.20	1,700.00	340.00
04/11/2023	JTG4	Email with M. Laskowski re case update	0.20	1,700.00	340.00
04/12/2023	JTG4	Email with M. Laskowski re case update	0.20	1,700.00	340.00
04/13/2023	JTG4	Email with M. Laskowski re case update	0.20	1,700.00	340.00
04/14/2023	JTG4	Email with M. Laskowski re case update	0.20	1,700.00	340.00
04/17/2023	JTG4	Email with M. Laskowski re case update (.2); emails with J. Evans re case update (.3)	0.50	1,700.00	850.00
04/18/2023	JTG4	Email with M. Laskowski re case update	0.20	1,700.00	340.00
04/20/2023	JTG4	Email with M. Laskowski re case update	0.40	1,700.00	680.00
04/21/2023	JTG4	Emails with M. Laskowski re case update	0.20	1,700.00	340.00

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2361261

Page 2

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/24/2023	JTG4	Email with M. Laskowski re case update	0.40	1,700.00	680.00
04/25/2023	ML30	Update case calendars	0.20	540.00	108.00
04/27/2023	JTG4	Email with M. Magzamen re case update	0.20	1,700.00	340.00
<b>Subtotal: B110 Case Administration</b>			<b>4.30</b>		<b>7,078.00</b>

**B113 Pleadings Review**

04/03/2023	JTG4	Review ECF notices and related pleadings	0.40	1,700.00	680.00
04/03/2023	ML30	Review recent filings and update working group re same (.3); update case calendars (.1).	0.40	540.00	216.00
04/04/2023	JTG4	Review ECF notices and related pleadings	0.20	1,700.00	340.00
04/04/2023	ML30	Review recent filings and update working group re same	0.20	540.00	108.00
04/05/2023	AM50	Review recent court filings.	0.60	1,725.00	1,035.00
04/05/2023	ML30	Review recent filings and update working group re same	0.20	540.00	108.00
04/06/2023	JTG4	Review ECF notices and related pleadings	0.40	1,700.00	680.00
04/06/2023	ML30	Review recent filings and update working group re same	0.20	540.00	108.00
04/07/2023	JTG4	Review ECF notices and related pleadings	0.20	1,700.00	340.00
04/07/2023	ML30	Review recent filings and update working group re same	0.20	540.00	108.00
04/10/2023	ML30	Review recent filings and update working group re same	0.20	540.00	108.00
04/11/2023	JTG4	Review ECF notices and related pleadings	0.30	1,700.00	510.00
04/11/2023	ML30	Review recent filings and update working group re same	0.20	540.00	108.00
04/12/2023	AM50	Review recent court filings.	0.50	1,725.00	862.50
04/12/2023	ML30	Review recent filings and update working group re same	0.40	540.00	216.00
04/13/2023	JTG4	Review ECF notices and related pleadings	0.30	1,700.00	510.00
04/13/2023	ML30	Review recent filings and update working group re same	0.20	540.00	108.00

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2361261

Page 3

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/14/2023	ML30	Review recent filings and update working group re same	0.20	540.00	108.00
04/17/2023	JTG4	Review ECF notices, related pleadings, and disclosure statement	1.50	1,700.00	2,550.00
04/17/2023	ML30	Review recent filings and update working group re same	0.50	540.00	270.00
04/18/2023	JTG4	Review ECF notices, related pleadings, and objections from parties in interest	0.80	1,700.00	1,360.00
04/18/2023	ML30	Review recent filings and update working group re same	0.20	540.00	108.00
04/19/2023	ML30	Review recent filings and update working group re same (.2); update case calendars (.3)	0.50	540.00	270.00
04/20/2023	JTG4	Review ECF notices and related pleadings	0.30	1,700.00	510.00
04/20/2023	ML30	Review recent filings and update working group re same	0.50	540.00	270.00
04/21/2023	ML30	Review recent filings and update working group re same	0.50	540.00	270.00
04/23/2023	JG32	Pleading review	0.80	1,875.00	1,500.00
04/24/2023	JTG4	Review ECF notices and related pleadings	0.30	1,700.00	510.00
04/24/2023	ML30	Monitor the docket and update working group re recent filings	0.60	540.00	324.00
04/25/2023	ML30	Review recent filings and prepare end of day update for working group	0.40	540.00	216.00
04/26/2023	JTG4	Review ECF notices and related pleadings	0.40	1,700.00	680.00
04/26/2023	ML30	Review recent filings and prepare end of day update for working group	0.20	540.00	108.00
04/27/2023	JTG4	Review ECF notices and related pleadings	0.30	1,700.00	510.00
04/27/2023	MM57	Review recent filings and update calendars and working group re same	0.20	540.00	108.00
04/28/2023	JTG4	Review ECF notices and related pleadings	0.30	1,700.00	510.00
04/30/2023	JTG4	Review notice of reset hearing	0.20	1,700.00	340.00
<b>Subtotal: B113 Pleadings Review</b>			<b>13.80</b>		<b>16,667.50</b>



Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2361261

Page 4

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>B155 Court Hearings</b>					
04/07/2023	JG32	Correspond with client regarding continued disclosure statement hearing	0.30	1,875.00	562.50
04/17/2023	JG32	Review submissions and notes to prepare for disclosure statement hearing (.4); correspond with S. Clements regarding same (.4)	0.80	1,875.00	1,500.00
04/18/2023	JTG4	Conferences with S. Thomas about preparation for disclosure statement hearing	0.40	1,700.00	680.00
04/18/2023	ML30	Correspond with S. Thomas re disclosure statement hearing needs	0.10	540.00	54.00
04/18/2023	SMT1	Review certain submissions and issues to prepare for court hearing regarding disclosure statement (.5); calls with J. Grogan regarding same (.4)	0.90	855.00	769.50
04/19/2023	JTG4	Attend disclosure statement hearing	1.40	1,700.00	2,380.00
04/19/2023	JTG4	Emails with S. Thomas and J. Evans regarding disclosure statement hearing prep	0.60	1,700.00	1,020.00
04/19/2023	JG32	Attend disclosure statement hearing (1.4); discussions with client regarding same (.5)	1.90	1,875.00	3,562.50
04/19/2023	JDE	Prepare notes for disclosure statement hearing (1.0); attend disclosure statement hearing (1.4)	2.40	1,600.00	3,840.00
04/19/2023	ML30	Review attorney needs for disclosure statement hearing	0.10	540.00	54.00
04/19/2023	SMT1	Review submissions and issues to prepare for hearing on disclosure statement order (1.7); attend hearing (1.4)	3.10	855.00	2,650.50
04/21/2023	ML30	Correspond with S. Thomas re adjourned disclosure statement hearing	0.10	540.00	54.00
<b>Subtotal: B155 Court Hearings</b>			<b>12.10</b>		<b>17,127.00</b>

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2361261

Page 5

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>B160 Fee/Employment Applications</b>					
04/24/2023	J12	Prepare CNO re interim fee application (.5); review and revise February and March fee statements (1.7); emails with J. Evans re same (.1).	2.30	1,125.00	2,587.50
04/24/2023	MM57	Draft CNO for PH first interim fee application (.3); correspond with J. Iaffaldano re: same (.1); correspond with J. Grogan re: same (.1)	0.50	540.00	270.00
04/25/2023	JTG4	Review docket in connection with fee application (.3); emails with K. Peguero regarding Benz objection (.4); correspond with J. Evans, J. Iaffaldano and M. Magzamen about same (.4)	1.10	1,700.00	1,870.00
04/25/2023	JDE	Review and comment on fee application objection.	0.50	1,600.00	800.00
04/26/2023	JTG4	Email with M. Magzamen re compensation procedures (.2); review same (.3); emails with S. Thomas, J. Evans regarding fee hearing (.4)	0.90	1,700.00	1,530.00
04/27/2023	MM57	Review compensation procedures (.2); correspond with J. Grogan and J. Iaffaldano re same (.1)	0.30	540.00	162.00
04/28/2023	JTG4	Emails with K. Peguero about fee hearing and related issues	0.30	1,700.00	510.00
<b>Subtotal: B160 Fee/Employment Applications</b>			<b>5.90</b>		<b>7,729.50</b>
<b>B195 Non-Working Travel</b>					
04/18/2023	JDE	Travel from New York, New York to Houston, Texas for disclosure statement hearing. (Bill at 1/2 rate)	4.00	800.00	3,200.00
04/19/2023	JDE	Travel from Houston, Texas to New York, New York after disclosure statement hearing (Bill at 1/2 rate)	4.00	800.00	3,200.00
<b>Subtotal: B195 Non-Working Travel</b>			<b>8.00</b>		<b>6,400.00</b>

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2361261

Page 6

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>B211 Financial Reports (Monthly Operating Reports)</b>					
04/21/2023	JTG4	Review MORs	0.50	1,700.00	850.00
<b>Subtotal: B211 Financial Reports (Monthly Operating Reports)</b>			<b>0.50</b>		<b>850.00</b>
<b>B260 Board of Directors Matters</b>					
04/03/2023	J12	Prepare director invoice.	0.50	1,125.00	562.50
<b>Subtotal: B260 Board of Directors Matters</b>			<b>0.50</b>		<b>562.50</b>
<b>B320 Plan and Disclosure Statement (including Business Plan)</b>					
04/07/2023	JG32	Review disclosure statement updates	1.10	1,875.00	2,062.50
04/12/2023	JG32	Review disclosure statement updates (1.1); correspond with client regarding same (.6)	1.70	1,875.00	3,187.50
04/17/2023	JG32	Review and comment on disclosure statement approval issues	0.80	1,875.00	1,500.00
04/18/2023	JTG4	Analyze updated plan documents	0.70	1,700.00	1,190.00
04/19/2023	JTG4	Review updated disclosure statement and plan	1.70	1,700.00	2,890.00
04/20/2023	JTG4	Review updated plan and disclosure statement documents	1.10	1,700.00	1,870.00
04/20/2023	JTG4	Review proposed disclosure statement order	0.50	1,700.00	850.00
04/21/2023	JTG4	Review order approving disclosure statement, conditionally approved disclosure statement, and bondholder summary	1.00	1,700.00	1,700.00
04/23/2023	JG32	Review and comment on litigation trust issues (.6); telephone conference with client on disclosure statement (.7)	1.30	1,875.00	2,437.50

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2361261

Page 7

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/24/2023	JTG4	Review updated plan, disclosure statement, and bondholder treatment summary	1.20	1,700.00	2,040.00
<b>Subtotal: B320 Plan and Disclosure Statement (including Business Plan)</b>			<b>11.10</b>		<b>19,727.50</b>
<b>Total</b>			<b>56.20</b>		<b>76,142.00</b>

**Timekeeper Summary**

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
JG32	Jayne Goldstein	Partner	8.70	1,875.00	16,312.50
AM50	Allison Miller	Partner	1.10	1,725.00	1,897.50
JTG4	James T. Grogan	Partner	21.40	1,700.00	36,380.00
JDE	Jeremy D. Evans	Of Counsel	2.90	1,600.00	4,640.00
JDE	Jeremy D. Evans	Of Counsel	8.00	800.00	6,400.00
JI2	Jack Iaffaldano	Associate	2.80	1,125.00	3,150.00
SMT1	Schlea M. Thomas	Associate	4.00	855.00	3,420.00
ML30	Mat Laskowski	Paralegal	6.30	540.00	3,402.00
MM57	Michael Magzamen	Paralegal	1.00	540.00	540.00

**Costs incurred and advanced**

<u>Date</u>	<u>Description</u>	<u>Quantity</u>	<u>Rate</u>	<u>Amount</u>
04/03/2023	Computer Search (Other)			2.16
04/07/2023	Airfare - Jeremy Evans; 03/23/2023; From/To: LGA/IAH/IAH/LGA; Airfare Class: Economy; Travel to Houston, Texas for the purpose of preparing for and attending Disclosure Statement hearing			467.80
04/07/2023	Travel Expense - Meals - Jeremy Evans; 03/27/2023; Restaurant: Marriott; City: Houston ; Dinner; Number of people: 1; Travel to Houston, Texas for the purpose of preparing for and attending Disclosure Statement hearing			29.23

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2361261

Page 8

04/07/2023	Travel Expense - Meals - Jeremy Evans; 03/29/2023; Restaurant: JW Marriott; City: Houston; Dinner; Number of people: 1; Travel to Houston, Texas for the purpose of preparing for and attending Disclosure Statement hearing	40.00
04/07/2023	Travel Expense - Meals - Jeremy Evans; 03/28/2023; Restaurant: JW Marriott; City: Houston; Dinner; Number of people: 1; Travel to Houston, Texas for the purpose of preparing for and attending Disclosure Statement hearing	40.00
04/07/2023	Lodging - Jeremy Evans; 03/29/2023; Hotel: Marriott; Check-in date: 03/27/2023; Check-out date: 03/29/2023; Travel to Houston, Texas for the purpose of preparing for and attending Disclosure Statement hearing	1,162.30
04/07/2023	Taxi/Ground Transportation - Jeremy Evans; 03/27/2023; From/To: hotel/airport; Service Type: Uber; Time: 12:32; Travel to Houston, Texas for the purpose of preparing for and attending Disclosure Statement hearing	113.09
04/07/2023	Taxi/Ground Transportation - Jeremy Evans; 03/29/2023; From/To: airport/home; Service Type: Taxi; Time: 12:12; Travel to Houston, Texas for the purpose of preparing for and attending Disclosure Statement hearing	60.24
04/07/2023	Taxi/Ground Transportation - Jeremy Evans; 03/27/2023; From/To: airport/home; Service Type: Uber; Time: 12:32; Travel to Houston, Texas for the purpose of preparing for and attending Disclosure Statement hearing	93.95
04/07/2023	Taxi/Ground Transportation - Jeremy Evans; 03/27/2023; From/To: home/airport; Service Type: Taxi; Time: 12:32; Travel to Houston, Texas for the purpose of preparing for and attending Disclosure Statement hearing	98.73
04/25/2023	Computer Search (Other)	0.09
<b>Total Costs incurred and advanced</b>		<b>\$2,107.59</b>

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2361261

Page 9

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Current Fees and Costs	\$78,249.59
Total Balance Due - Due Upon Receipt	<u>\$78,249.59</u>

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:	)	
	)	Chapter 11
	)	
GWG Holdings, Inc., <i>et al.</i> , <sup>1</sup>	)	Case No. 22-90032 (MI)
	)	
Debtors.	)	(Jointly Administered)
	)	

**NOTICE OF SEVENTH MONTHLY FEE STATEMENT OF PAUL HASTINGS LLP,  
COUNSEL TO SEAN CLEMENTS AND THE CONFLICTS COMMITTEE OF THE  
BOARD OF DIRECTORS OF GWG DLP FUNDING IV, LLC FOR THE PERIOD  
FROM MAY 1, 2023 THROUGH MAY 31, 2023**

Name of applicant:	Paul Hastings LLP	
Applicant’s Role in the Case:	Attorneys to Sean Clements and the Conflicts Committee of the board of directors of GWG DLP Funding IV, LLC (“ <u>DLP IV</u> ”)	
Date Order of Employment Signed and Docket No.:	January 6, 2023 (effective as of October 31, 2022) [Docket No. 1325]	
	Beginning Date	End Date
Time period covered by this Statement:	05/01/2023	05/31/2023
Summary of Total Fees and Expenses Requested		
Total fees requested in this Statement:	\$57,089.60 (80% of \$71,362.00)	
Total expenses requested in this Statement:	\$1,614.84	
Total fees and expenses requested in this Statement (excluding 20% holdback):	\$72,976.84	
Total fees and expenses requested in this Statement (including 20% holdback):	\$58,704.44	
Summary of Attorney Fees Requested		
Total attorney fees requested in this Statement:	\$65,746.00	

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: GWG Holdings, Inc. (2607); GWG Life, LLC (6955); GWG Life USA, LLC (5538), GWG DLP Funding IV, LLC (2589); GWG DLP Funding VI, LLC (6955); and GWG DLP Funding Holdings VI, LLC (6955). The location of Debtor GWG Holdings, Inc.'s principal place of business and the Debtors' service address is 325 N. St. Paul Street, Suite 2650 Dallas, TX 75201. Further information regarding the Debtors and these chapter 11 cases is available at the website of the Debtors' claims and noticing agent: <https://donlinrecano.com/gwg>.

Total actual attorney hours covered by this Statement:	44.00
Average hourly rate for attorneys:	\$1,494
Summary of Paraprofessional Fees Requested	
Total paraprofessional fees requested in this Statement:	\$5,616.00
Total actual paraprofessional hours covered by this Statement:	10.40
Average hourly rate for paraprofessionals:	\$540

In accordance with the *Corrected Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and (II) Granting Related Relief* [Docket No. 378] (the “Interim Compensation Order”),<sup>2</sup> Paul Hastings LLP (“Paul Hastings”) respectfully submits this seventh monthly statement (the “Monthly Statement”) and requests payment for services rendered and reimbursement of expenses incurred as counsel to Sean Clements and the Conflicts Committee of the board of directors of DLP IV in the above-captioned chapter 11 cases for the period from May 1, 2023 through and including May 31, 2023 (the “Fee Period”) in the amounts set forth above.

### **SERVICES RENDERED AND EXPENSES INCURRED**

1. Attached hereto as **Exhibit A** is a timekeeper summary that includes the name, title, department, bar admission, hourly billing rate, aggregate hours, and amount of fees earned for each Paul Hastings individual who provided services during the Fee Period.

2. Attached hereto as **Exhibit B** is a summary of Paul Hastings’ services rendered and compensation sought, by project category, for the Fee Period.

3. Attached hereto as **Exhibit C** is a summary of expenses incurred and reimbursement sought, by expense type, for the Fee Period.

4. Attached hereto as **Exhibit D** are the fee statements of Paul Hastings for services provided during the Fee Period.

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Interim Compensation Order.



### **NOTICE AND OBJECTION PROCEDURES**

1. Notice of this Monthly Statement will be given to the following parties (collectively, the “Application Recipients”): (i) the Debtors c/o GWG Holdings, Inc., 325 N. St. Paul St., Suite 2650, Dallas, TX 75201, Attn: Timothy Evans; (ii) counsel to the Debtors, Mayer Brown LLP, 71 S. Wacker Drive, Chicago, IL 60606, Attn: Thomas S. Kiriakos; (iii) co-counsel to the Debtors, Jackson Walker LLP, 1401 McKinney Street, Suite 1900, Houston, TX 77010, Attn: Kristhy M. Peguero and Matthew D. Cavanaugh; (iv) counsel to the DIP Lender, Sidley Austin LLP, One South Dearborn, Chicago, IL 60603, Attn: Matthew A. Clemente; (v) counsel to Bank of Utah in its capacity as indenture trustee for the Bonds, Akin Gump Strauss Hauer & Feld LLP, 2001 K Street NW, Washington, D.C., 20006-1037, Attn: Scott Alberino; (vi) counsel to any statutory committee appointed in these cases; and (vii) the Office of the U.S. Trustee for the Southern District of Texas, 515 Rusk Street, Suite 3516, Houston, TX 77002, Attn: Hector Duran.

2. Objections to this Monthly Statement, if any, must be served upon the Application Recipients and the undersigned counsel by or before 4:00 p.m. (CT) on the fourteenth day after service of this Monthly Statement (the “Objection Deadline”), setting forth with specificity the objectionable fees or expenses, the amount of the disputed fees or expenses, and the basis for such objection. If no objections are received by the Objection Deadline, the Debtors shall promptly pay Paul Hastings 80 percent of the fees and 100 percent of the expenses identified in this Monthly Statement.

3. To the extent that an objection to this Monthly Statement is received on or before the Objection Deadline, the Debtors shall withhold payment of that portion of this Monthly Statement to which the objection is directed and promptly pay the remainder of the fees and expenses in the percentages set forth above. To the extent such objection is not resolved,

pursuant to the procedures set forth in the Interim Compensation Order, the objecting party shall file its objection with the Court and serve the objection on the Application Recipients and the undersigned counsel. Thereafter, Paul Hastings may either (a) file with the Court a response to the objection together with a request for payment of the appropriate portion of the disputed amount or (b) preserve and schedule the disputed amount for consideration at the next interim or final fee application hearing.

4. To the extent that time or disbursement charges for services rendered or disbursements incurred relate to the Fee Period, but were not processed before the preparation of this Monthly Statement, or Paul Hastings has for any other reason not sought compensation or reimbursement with respect to such services or expenses, Paul Hastings reserves the right to request additional compensation for such services, and reimbursement of such expenses, in a supplemental or future statement.

*[Remainder of page intentionally left blank]*

Dated: August 16, 2023  
Houston, Texas

Respectfully submitted,

/s/ James T. Grogan III

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**PAUL HASTINGS LLP**

James T. Grogan III (TX Bar No. 24027354)  
600 Travis Street, 58th Floor  
Houston, Texas 77002  
Telephone: (713) 860-7300  
Facsimile: (713) 353-3100  
Email: jamesgrogan@paulhastings.com

-and-

Jayme T. Goldstein (admitted *pro hac vice*)  
Daniel A Fliman (admitted *pro hac vice*)  
Allison Miller (admitted *pro hac vice*)  
Jeremy D. Evans (admitted *pro hac vice*)  
John F. Iaffaldano (admitted *pro hac vice*)  
200 Park Avenue  
New York, New York 10166  
Telephone: (212) 318-6000  
Facsimile: (212) 319-4090  
Email: jaymegoldstein@paulhastings.com

*Counsel to Sean Clements and the Conflicts Committee of  
the board of directors of DLP IV*

**Exhibit A**

**COMPENSATION BY PROFESSIONAL AND PARAPROFESSIONAL FOR FEE PERIOD**

				Total for Fee Period	
Name	Department or Group	Date of First Admission	Hourly Rate	Hours Billed	Amount
Fliman, Dan	Corporate	2003	\$1,725.00	2.70	\$4,657.50
Goldstein, Jayme	Corporate	2003	\$1,875.00	4.60	\$8,625.00
Grogan, James	Corporate	2000	\$1,700.00	16.30	\$27,710.00
Miller, Allison	Corporate	2004	\$1,725.00	1.70	\$2,932.50
<b>Total Partner:</b>				<b>25.30</b>	<b>\$43,925.00</b>
Evans, Jeremy	Corporate	2013	\$1,600.00	2.90	\$4,640.00
<b>Total Counsel:</b>				<b>2.90</b>	<b>\$4,640.00</b>
Iaffaldano, Jack	Corporate	2020	\$1,125.00	13.60	\$15,300.00
Thomas, Schlea	Corporate	2022	\$855.00	2.20	\$1,881.00
<b>Total Associate:</b>				<b>15.80</b>	<b>\$17,181.00</b>
Laskowski, Mat	Paralegal		\$540.00	9.30	\$5,022.00
Magzamen, Michel	Paralegal		\$540.00	1.10	\$594.00
<b>Total Paraprofessional:</b>				<b>10.40</b>	<b>\$5,616.00</b>
<b>Total:</b>				<b>54.40</b>	<b>\$71,362.00</b>

**Exhibit B**

**COMPENSATION BY PROJECT CATEGORY FOR FEE PERIOD**

		Total for Fee Period	
U.S. Trustee Task Code and Project Category		Total Hours	Total Fees
B110	Case Administration	5.80	\$9,026.00
B113	Pleadings Review	18.70	\$22,159.00
B155	Court Hearings	4.10	\$5,618.50
B160	Employment / Fee Applications (Paul Hastings)	8.90	\$10,941.00
B260	Board of Directors Matters	3.20	\$4,755.00
B320	Plan and Disclosure Statement	13.70	\$18,862.50
<b>TOTAL</b>		<b>54.40</b>	<b>\$71,362.00</b>

**Exhibit C**

**EXPENSE SUMMARY FOR FEE PERIOD**

Category	Total for Fee Period
Airfare	\$577.80
Lodging	\$589.94
Taxi/Ground Transportation	\$407.10
Meals	\$40.00
<b>TOTAL</b>	<b>\$1,614.84</b>

**Exhibit D**

**FEE STATEMENTS FOR FEE PERIOD**



**PAUL HASTINGS LLP**  
200 Park Avenue, New York, NY 10166-3205  
t: +1.212.318.6000 | f: +1.212.319.4090 | [www.paulhastings.com](http://www.paulhastings.com)

Conflicts Committee of GWG DLP Funding IV, LLC  
Suite 1200  
220 South Sixth Street  
Minneapolis, MN 55402

July 28, 2023

Please Refer to  
Invoice Number: 2366570

Attn: Sean Clements

PH LLP Tax ID No. 95-2209675

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## SUMMARY SHEET

### Bankruptcy Case

PH LLP Client/Matter # 51132-00002  
Jayme Goldstein

Legal fees for professional services for the period ending May 31, 2023	\$71,362.00
Costs incurred and advanced	1,614.84
<b>Current Fees and Costs Due</b>	<b>\$72,976.84</b>
<b>Total Balance Due - Due Upon Receipt</b>	<b>\$72,976.84</b>

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

**TO PROTECT AGAINST FRAUD**, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Teri Goffredo @ 213-683-5045 or via email @ [terigoffredo@paulhastings.com](mailto:terigoffredo@paulhastings.com) and requesting written and verbal confirmation.

### Wiring and ACH Instructions:

Citibank  
ABA # 322271724  
SWIFT Address: CITIUS33  
787 W. 5th Street  
Los Angeles, CA 90071  
Account Number: 206628380  
Account Name: Paul Hastings LLP

### Remittance Address:

Paul Hastings LLP  
Lockbox 4803  
PO Box 894803  
Los Angeles, CA 90189-4803

For wires, please reference the invoice, client and matter number(s) being paid  
For ACH payments, please use the CTX format and/or send any remittances to [cashepn@paulhastings.com](mailto:cashepn@paulhastings.com). This is a no-reply mailbox  
Please refer all questions to [billing@paulhastings.com](mailto:billing@paulhastings.com)





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Conflicts Committee of GWG DLP Funding IV, LLC  
Suite 1200  
220 South Sixth Street  
Minneapolis, MN 55402

July 28, 2023

Please Refer to  
Invoice Number: 2366570

Attn: Sean Clements

PH LLP Tax ID No. 95-2209675

---

## REMITTANCE COPY

### **Bankruptcy Case**

PH LLP Client/Matter # 51132-00002  
Jayme Goldstein

Legal fees for professional services  
for the period ending May 31, 2023

\$71,362.00

Costs incurred and advanced

1,614.84

**Current Fees and Costs Due**

**\$72,976.84**

**Total Balance Due - Due Upon Receipt**

**\$72,976.84**

---

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

***TO PROTECT AGAINST FRAUD, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Teri Goffredo @ 213-683-5045 or via email @ [terigoffredo@paulhastings.com](mailto:terigoffredo@paulhastings.com) and requesting written and verbal confirmation.***

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Please refer all questions to [billing@paulhastings.com](mailto:billing@paulhastings.com)



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Conflicts Committee of GWG DLP Funding IV, LLC July 28, 2023  
Suite 1200

220 South Sixth Street  
Minneapolis, MN 55402

Please Refer to  
Invoice Number: 2366570

Attn: Sean Clements

PH LLP Tax ID No. 95-2209675

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FOR PROFESSIONAL SERVICES RENDERED  
for the period ending May 31, 2023

**Bankruptcy Case** **\$71,362.00**

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>B110 Case Administration</b>					
05/01/2023	ML30	Update case calendars (.2); update distribution lists for case notice and pleadings (.2); correspond with J. Iaffaldano re hearing needs (.1).	0.50	540.00	270.00
05/01/2023	MM57	Correspond with J. Iaffaldano re: case calendar	0.20	540.00	108.00
05/03/2023	JTG4	Emails with M. Laskowski re case updates	0.20	1,700.00	340.00
05/04/2023	JTG4	Emails with M. Laskowski re case updates	0.20	1,700.00	340.00
05/04/2023	ML30	Update case calendars	0.10	540.00	54.00
05/05/2023	JTG4	Emails with M. Laskowski re case updates	0.20	1,700.00	340.00
05/08/2023	JTG4	Emails with M. Laskowski re case updates	0.10	1,700.00	170.00
05/09/2023	JTG4	Emails with M. Laskowski re case updates	0.20	1,700.00	340.00
05/11/2023	JTG4	Emails with M. Laskowski re case updates	0.20	1,700.00	340.00
05/12/2023	JTG4	Emails with M. Laskowski re case updates	0.20	1,700.00	340.00
05/15/2023	JTG4	Emails with M. Laskowski re case updates	0.20	1,700.00	340.00
05/16/2023	JTG4	Emails with M. Laskowski re case updates	0.20	1,700.00	340.00
05/17/2023	JTG4	Emails with M. Laskowski re case updates	0.20	1,700.00	340.00

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2366570

Page 2

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/17/2023	ML30	Correspond with J. Iaffaldano re 5.18.23 hearing needs	0.10	540.00	54.00
05/18/2023	JTG4	Emails with M. Laskowski re case updates	0.20	1,700.00	340.00
05/18/2023	JG32	Review and prepare notes re case updates and going forward plan (.6); telephone conference with client to discuss same (.6)	1.20	1,875.00	2,250.00
05/19/2023	JTG4	Emails with M. Laskowski re case updates	0.20	1,700.00	340.00
05/22/2023	JTG4	Emails with M. Laskowski re case updates	0.20	1,700.00	340.00
05/23/2023	JTG4	Emails with M. Laskowski re case updates	0.20	1,700.00	340.00
05/24/2023	JTG4	Emails with M. Laskowski re case updates	0.20	1,700.00	340.00
05/25/2023	JTG4	Emails with M. Laskowski re case updates	0.20	1,700.00	340.00
05/26/2023	JTG4	Emails with M. Laskowski re case updates	0.20	1,700.00	340.00
05/30/2023	JTG4	Emails with M. Laskowski re case updates	0.20	1,700.00	340.00
05/31/2023	JTG4	Emails with M. Laskowski re case updates	0.20	1,700.00	340.00
<b>Subtotal: B110 Case Administration</b>			<b>5.80</b>		<b>9,026.00</b>

**B113 Pleadings Review**

05/01/2023	AM50	Review recent court filings regarding exclusivity (.3); review updates from J. Evans regarding same (.2)	0.50	1,725.00	862.50
05/01/2023	JTG4	Review ECF notices	0.30	1,700.00	510.00
05/01/2023	ML30	Review recent filings and update working group re same	0.40	540.00	216.00
05/02/2023	JTG4	Review ECF notices	0.30	1,700.00	510.00
05/02/2023	ML30	Review recent filings and update working group re same	0.40	540.00	216.00
05/03/2023	JTG4	Review ECF notices	0.20	1,700.00	340.00
05/03/2023	ML30	Review recent filings and update working group re same	0.20	540.00	108.00
05/04/2023	JTG4	Review ECF notices	0.20	1,700.00	340.00
05/04/2023	ML30	Review recent filings and update working group re same	0.40	540.00	216.00

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2366570

Page 3

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/05/2023	JTG4	Review ECF notices	0.20	1,700.00	340.00
05/05/2023	ML30	Review recent filings and update working group re same	0.20	540.00	108.00
05/08/2023	JTG4	Review recent filings	0.20	1,700.00	340.00
05/08/2023	ML30	Review recent filings and update working group re same	0.20	540.00	108.00
05/09/2023	JTG4	Review ECF notices	0.20	1,700.00	340.00
05/09/2023	ML30	Review recent filings and update working group re same	0.20	540.00	108.00
05/10/2023	ML30	Review recent filings and update working group re same	0.20	540.00	108.00
05/11/2023	JTG4	Review ECF notices	0.20	1,700.00	340.00
05/11/2023	ML30	Review recent filings and update working group re same	0.20	540.00	108.00
05/12/2023	JTG4	Review ECF notices	0.20	1,700.00	340.00
05/12/2023	ML30	Review recent filings and update working group re same	0.20	540.00	108.00
05/15/2023	JTG4	Review ECF notices	0.40	1,700.00	680.00
05/15/2023	ML30	Review recent filings and update working group re same	0.20	540.00	108.00
05/16/2023	JTG4	Review ECF notices (.2); review Beneficient motion (.3)	0.50	1,700.00	850.00
05/16/2023	ML30	Review recent filings and update case calendars and working group re same	0.60	540.00	324.00
05/17/2023	JTG4	Review ECF notices and related pleadings	0.40	1,700.00	680.00
05/17/2023	ML30	Review recent filings and update working group re same	0.50	540.00	270.00
05/18/2023	JTG4	Review ECF notices (.2); review complaint against Fifth Season (.4)	0.60	1,700.00	1,020.00
05/18/2023	JG32	Review recently filed pleadings	0.70	1,875.00	1,312.50
05/18/2023	ML30	Review recent filings and update case calendars and working group re same	0.40	540.00	216.00
05/19/2023	JTG4	Review ECF notices	0.20	1,700.00	340.00
05/19/2023	ML30	Review recent filings and update working group re same	0.30	540.00	162.00

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2366570

Page 4

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/22/2023	JTG4	Review ECF notices (.2); review Heppner / Ben Rule 2004 motion (.4)	0.60	1,700.00	1,020.00
05/22/2023	ML30	Review recent filings and update working group re same	0.50	540.00	270.00
05/23/2023	JTG4	Review ECF notices (.2); review new docket entries and related documents (.3)	0.50	1,700.00	850.00
05/23/2023	ML30	Review recent filings and update working group re same	0.60	540.00	324.00
05/24/2023	JTG4	Review ECF notices (.2); review exit credit agreement pleadings (.6)	0.80	1,700.00	1,360.00
05/24/2023	ML30	Review recent filings and update case calendars and working group re same	0.60	540.00	324.00
05/25/2023	JTG4	Review ECF notices and related pleadings	0.50	1,700.00	850.00
05/25/2023	ML30	Review recent filings and update case calendars and working group re same	1.00	540.00	540.00
05/26/2023	JTG4	Review ECF notices (.2); review L Bond Management emergency motion (.3)	0.50	1,700.00	850.00
05/26/2023	ML30	Review recent filings and update working group re same	0.40	540.00	216.00
05/30/2023	JTG4	Review ECF notices (.2); review Fifth Season motion (.3)	0.50	1,700.00	850.00
05/30/2023	ML30	Review recent filings and update working group re same	0.40	540.00	216.00
05/31/2023	JTG4	Review ECF notices	0.20	1,700.00	340.00
05/31/2023	JG32	Review recently filed pleadings regarding open case issues and next steps	1.20	1,875.00	2,250.00
05/31/2023	ML30	Review recent filings and update working group and case calendars re same	0.50	540.00	270.00
<b>Subtotal: B113 Pleadings Review</b>			<b>18.70</b>		<b>22,159.00</b>

**B155 Court Hearings**

05/01/2023	J12	Monitor hearing on Benz objections to fee applications	0.50	1,125.00	562.50
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Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2366570

Page 5

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/01/2023	JTG4	Attend hearing on Benz objections to fee applications (.5); emails with J. Evans and J. Iaffaldano re outcome of hearing (.3)	0.80	1,700.00	1,360.00
05/01/2023	JDE	Attend fee application hearing.	0.50	1,600.00	800.00
05/01/2023	SMT1	Prepare outline for hearing regarding compensation application (.4); attend hearing regarding same (.5)	0.90	855.00	769.50
05/23/2023	JTG4	Prepare outline for upcoming hearing	0.40	1,700.00	680.00
05/24/2023	JTG4	Attend hearing on Beneficient lift stay motion and protective order issues	0.70	1,700.00	1,190.00
05/24/2023	SMT1	Attend portion of hearing regarding Beneficient lift stay motion	0.30	855.00	256.50
<b>Subtotal: B155 Court Hearings</b>			<b>4.10</b>		<b>5,618.50</b>

**B160 Fee/Employment Applications**

05/01/2023	JI2	Emails with M. Magzamen re fee statements and CNO re same (.3); review interim compensation order (.2); revise fee statement (.4)	0.90	1,125.00	1,012.50
05/01/2023	JTG4	Emails with M. Magzamen re CNO on PH fee statement (.3); review CNO (.2)	0.50	1,700.00	850.00
05/01/2023	MM57	Correspond with J. Grogan re: order on fee application (.2); revise and e-file related CNO (.2)	0.40	540.00	216.00
05/01/2023	SMT1	Draft certificate of no objection regarding first interim fee application	1.00	855.00	855.00
05/02/2023	JTG4	Email with M. Laskowski re fee order (.1); review same (.1)	0.20	1,700.00	340.00
05/04/2023	JTG4	Emails with J. Iaffaldano about monthly fee application (.5); review same (.3)	0.80	1,700.00	1,360.00
05/04/2023	MM57	Correspond with J. Iaffaldano re: fee statements	0.10	540.00	54.00
05/09/2023	JI2	Revise fee statements (.8); correspond with J. Grogan re same (.1)	0.90	1,125.00	1,012.50
05/09/2023	JTG4	Review and revise monthly fee statements	0.70	1,700.00	1,190.00

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2366570

Page 6

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/11/2023	J12	Revise February fee statement (.5); revise March fee statement (.4); emails with J. Grogan re same (.2)	1.10	1,125.00	1,237.50
05/11/2023	JTG4	Correspond with J. Iaffaldano regarding updated fee statements (.2); review and comment on same (.3)	0.50	1,700.00	850.00
05/16/2023	JTG4	Emails with M. Magzamen about monthly fee statements	0.30	1,700.00	510.00
05/16/2023	MM57	Review fee statements and e-file same	0.40	540.00	216.00
05/31/2023	J12	Revise April fee statement (.4); draft interim fee application (.7).	1.10	1,125.00	1,237.50
<b>Subtotal: B160 Fee/Employment Applications</b>			<b>8.90</b>		<b>10,941.00</b>

**B260 Board of Directors Matters**

05/01/2023	J12	Prepare invoice for S. Clements	0.40	1,125.00	450.00
05/03/2023	J12	Attend board call re plan issues	0.50	1,125.00	562.50
05/16/2023	JDE	Correspond and conference with S. Clements regarding tail coverage	0.50	1,600.00	800.00
05/17/2023	JDE	Prepare for and attend bi-weekly board meeting.	0.50	1,600.00	800.00
05/24/2023	JDE	Prepare for and attend board call.	0.30	1,600.00	480.00
05/31/2023	AM50	Review updates from DLP IV board meeting.	0.50	1,725.00	862.50
05/31/2023	JDE	Prepare for and attend board call.	0.50	1,600.00	800.00
<b>Subtotal: B260 Board of Directors Matters</b>			<b>3.20</b>		<b>4,755.00</b>

**B320 Plan and Disclosure Statement (including Business Plan)**

05/03/2023	DF9	Correspond with J. Iaffaldano re plan exculpation provisions (.4); analysis re same (.7)	1.10	1,725.00	1,897.50
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Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2366570

Page 7

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/03/2023	JI2	Correspond with S. Clements re plan issues (.2); analyze plan issues and related case law and statutory authority (2.8); correspond with D. Fliman regarding exculpation provisions (.4)	3.40	1,125.00	3,825.00
05/04/2023	AM50	Correspond with D. Fliman and J. Evans on recent developments	0.70	1,725.00	1,207.50
05/04/2023	DF9	Call with J. Evans and client re plan exculpation provisions (.3); review caselaw re same (.8)	1.10	1,725.00	1,897.50
05/04/2023	JI2	Analyze exculpation issues and related authority (.8); call with S. Clements re same (.4).	1.20	1,125.00	1,350.00
05/04/2023	JDE	Call with client and D. Fliman regarding plan exculpation provisions	0.30	1,600.00	480.00
05/16/2023	JI2	Emails with J. Evans re plan exculpation issues.	0.70	1,125.00	787.50
05/27/2023	DF9	Correspond with J. Evans re plan revisions (.2); review same (.3)	0.50	1,725.00	862.50
05/29/2023	JI2	Emails with J. Evans and D. Fliman re exculpation issues (.2); analyze same and related precedent (.6).	0.80	1,125.00	900.00
05/30/2023	JI2	Review case law re exculpation issues (1.6); call with J. Evans and Mintz & Gold re same (.3); emails with J. Evans re same (.2).	2.10	1,125.00	2,362.50
05/30/2023	JDE	Call with Mintz & Gold and J. Iaffaldano to discuss exculpations.	0.30	1,600.00	480.00
05/31/2023	JG32	Review case updates from J. Evans regarding exculpation (1.1); correspond with client regarding same (.4)	1.50	1,875.00	2,812.50
<b>Subtotal: B320 Plan and Disclosure Statement (including Business Plan)</b>			<b>13.70</b>		<b>18,862.50</b>
<b>Total</b>			<b>54.40</b>		<b>71,362.00</b>

**Timekeeper Summary**



Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2366570

Page 8

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
JG32	Jayne Goldstein	Partner	4.60	1,875.00	8,625.00
AM50	Allison Miller	Partner	1.70	1,725.00	2,932.50
DF9	Dan Fliman	Partner	2.70	1,725.00	4,657.50
JTG4	James T. Grogan	Partner	16.30	1,700.00	27,710.00
JDE	Jeremy D. Evans	Of Counsel	2.90	1,600.00	4,640.00
JI2	Jack Iaffaldano	Associate	13.60	1,125.00	15,300.00
SMT1	Schlea M. Thomas	Associate	2.20	855.00	1,881.00
ML30	Mat Laskowski	Paralegal	9.30	540.00	5,022.00
MM57	Michael Magzamen	Paralegal	1.10	540.00	594.00

**Costs incurred and advanced**

<u>Date</u>	<u>Description</u>	<u>Quantity</u>	<u>Rate</u>	<u>Amount</u>
05/03/2023	Airfare - Jeremy Evans; 04/18/2023; From/To: LGA/IAH; Airfare Class: Economy; Trip to Houston for client matter			577.80
05/03/2023	Travel Expense - Meals - Jeremy Evans; 04/18/2023; Restaurant: Pizza Hut; City: Houston; Dinner; Number of people: 1; Trip to Houston for client matter			40.00
05/03/2023	Lodging - Jeremy Evans; 04/19/2023; Hotel: Marriott; Check-in date: 04/18/2023; Check-out date: 04/19/2023; Trip to Houston for client matter			589.94
05/03/2023	Taxi/Ground Transportation - Jeremy Evans; 04/18/2023; From/To: Airport/Hotel; Service Type: Uber; Time: 22:03; Trip to Houston for client matter			106.93
05/03/2023	Taxi/Ground Transportation - Jeremy Evans; 04/19/2023; From/To: Hotel/Airport ; Service Type: Uber; Time: 15:56; Trip to Houston for client matter			110.88
05/03/2023	Taxi/Ground Transportation - Jeremy Evans; 04/18/2023; From/To: Home/Airport ; Service Type: Uber; Time: 17:03; Trip to Houston for client matter			114.90

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2366570

Page 9

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05/03/2023	Taxi/Ground Transportation - Jeremy Evans; 04/19/2023; From/To: Airport/Home; Service Type: Uber; Time: 12:02; Trip to Houston for client matter	74.39
<b>Total Costs incurred and advanced</b>		<hr/> \$1,614.84
<b>Current Fees and Costs</b>		<b>\$72,976.84</b>
<b>Total Balance Due - Due Upon Receipt</b>		<b>\$72,976.84</b>

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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:	)	
	)	Chapter 11
	)	
GWG Holdings, Inc., <i>et al.</i> , <sup>1</sup>	)	Case No. 22-90032 (MI)
	)	
Debtors.	)	(Jointly Administered)
	)	

**NOTICE OF EIGHTH MONTHLY FEE STATEMENT OF PAUL HASTINGS LLP,  
COUNSEL TO SEAN CLEMENTS AND THE CONFLICTS COMMITTEE OF THE  
BOARD OF DIRECTORS OF GWG DLP FUNDING IV, LLC FOR THE PERIOD  
FROM JUNE 1, 2023 THROUGH JUNE 19, 2023**

Name of applicant:	Paul Hastings LLP	
Applicant’s Role in the Case:	Attorneys to Sean Clements and the Conflicts Committee of the board of directors of GWG DLP Funding IV, LLC (“ <u>DLP IV</u> ”)	
Date Order of Employment Signed and Docket No.:	January 6, 2023 (effective as of October 31, 2022) [Docket No. 1325]	
	Beginning Date	End Date
Time period covered by this Statement:	06/01/2023	06/19/2023
Summary of Total Fees and Expenses Requested		
Total fees requested in this Statement:	\$60,883.20 (80% of \$76,104.00)	
Total expenses requested in this Statement:	\$1,962.36	
Total fees and expenses requested in this Statement (excluding 20% holdback):	\$78,066.36	
Total fees and expenses requested in this Statement (including 20% holdback):	\$62,845.56	
Summary of Attorney Fees Requested		
Total attorney fees requested in this Statement:	\$73,620.00	

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: GWG Holdings, Inc. (2607); GWG Life, LLC (6955); GWG Life USA, LLC (5538), GWG DLP Funding IV, LLC (2589); GWG DLP Funding VI, LLC (6955); and GWG DLP Funding Holdings VI, LLC (6955). The location of Debtor GWG Holdings, Inc.'s principal place of business and the Debtors' service address is 325 N. St. Paul Street, Suite 2650 Dallas, TX 75201. Further information regarding the Debtors and these chapter 11 cases is available at the website of the Debtors' claims and noticing agent: <https://donlinrecano.com/gwg>.

Total actual attorney hours covered by this Statement:	56.30
Average hourly rate for attorneys:	\$1,308
Summary of Paraprofessional Fees Requested	
Total paraprofessional fees requested in this Statement:	\$2,484.00
Total actual paraprofessional hours covered by this Statement:	4.60
Average hourly rate for paraprofessionals:	\$540

In accordance with the *Corrected Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and (II) Granting Related Relief* [Docket No. 378] (the “Interim Compensation Order”),<sup>2</sup> Paul Hastings LLP (“Paul Hastings”) respectfully submits this eighth monthly statement (the “Monthly Statement”) and requests payment for services rendered and reimbursement of expenses incurred as counsel to Sean Clements and the Conflicts Committee of the board of directors of DLP IV in the above-captioned chapter 11 cases for the period from June 1, 2023 through and including June 19, 2023 (the “Fee Period”) in the amounts set forth above.

### **SERVICES RENDERED AND EXPENSES INCURRED**

1. Attached hereto as **Exhibit A** is a timekeeper summary that includes the name, title, department, bar admission, hourly billing rate, aggregate hours, and amount of fees earned for each Paul Hastings individual who provided services during the Fee Period.

2. Attached hereto as **Exhibit B** is a summary of Paul Hastings’ services rendered and compensation sought, by project category, for the Fee Period.

3. Attached hereto as **Exhibit C** is a summary of expenses incurred and reimbursement sought, by expense type, for the Fee Period.

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<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Interim Compensation Order.

4. Attached hereto as **Exhibit D** are the fee statements of Paul Hastings for services provided during the Fee Period.

### **NOTICE AND OBJECTION PROCEDURES**

1. Notice of this Monthly Statement will be given to the following parties (collectively, the “Application Recipients”): (i) the Debtors c/o GWG Holdings, Inc., 325 N. St. Paul St., Suite 2650, Dallas, TX 75201, Attn: Timothy Evans; (ii) counsel to the Debtors, Mayer Brown LLP, 71 S. Wacker Drive, Chicago, IL 60606, Attn: Thomas S. Kiriakos; (iii) co-counsel to the Debtors, Jackson Walker LLP, 1401 McKinney Street, Suite 1900, Houston, TX 77010, Attn: Kristhy M. Peguero and Matthew D. Cavanaugh; (iv) counsel to the DIP Lender, Sidley Austin LLP, One South Dearborn, Chicago, IL 60603, Attn: Matthew A. Clemente; (v) counsel to Bank of Utah in its capacity as indenture trustee for the Bonds, Akin Gump Strauss Hauer & Feld LLP, 2001 K Street NW, Washington, D.C., 20006-1037, Attn: Scott Alberino; (vi) counsel to any statutory committee appointed in these cases; and (vii) the Office of the U.S. Trustee for the Southern District of Texas, 515 Rusk Street, Suite 3516, Houston, TX 77002, Attn: Hector Duran.

2. Objections to this Monthly Statement, if any, must be served upon the Application Recipients and the undersigned counsel by or before 4:00 p.m. (CT) on the fourteenth day after service of this Monthly Statement (the “Objection Deadline”), setting forth with specificity the objectionable fees or expenses, the amount of the disputed fees or expenses, and the basis for such objection. If no objections are received by the Objection Deadline, the Debtors shall promptly pay Paul Hastings 80 percent of the fees and 100 percent of the expenses identified in this Monthly Statement.

3. To the extent that an objection to this Monthly Statement is received on or before the Objection Deadline, the Debtors shall withhold payment of that portion of this Monthly

Statement to which the objection is directed and promptly pay the remainder of the fees and expenses in the percentages set forth above. To the extent such objection is not resolved, pursuant to the procedures set forth in the Interim Compensation Order, the objecting party shall file its objection with the Court and serve the objection on the Application Recipients and the undersigned counsel. Thereafter, Paul Hastings may either (a) file with the Court a response to the objection together with a request for payment of the appropriate portion of the disputed amount or (b) preserve and schedule the disputed amount for consideration at the next interim or final fee application hearing.

4. To the extent that time or disbursement charges for services rendered or disbursements incurred relate to the Fee Period, but were not processed before the preparation of this Monthly Statement, or Paul Hastings has for any other reason not sought compensation or reimbursement with respect to such services or expenses, Paul Hastings reserves the right to request additional compensation for such services, and reimbursement of such expenses, in a supplemental or future statement.

*[Remainder of page intentionally left blank]*

Dated: August 16, 2023  
Houston, Texas

Respectfully submitted,

/s/ James T. Grogan III

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**PAUL HASTINGS LLP**

James T. Grogan III (TX Bar No. 24027354)  
600 Travis Street, 58th Floor  
Houston, Texas 77002  
Telephone: (713) 860-7300  
Facsimile: (713) 353-3100  
Email: jamesgrogan@paulhastings.com

-and-

Jayme T. Goldstein (admitted *pro hac vice*)  
Daniel A Fliman (admitted *pro hac vice*)  
Allison Miller (admitted *pro hac vice*)  
Jeremy D. Evans (admitted *pro hac vice*)  
John F. Iaffaldano (admitted *pro hac vice*)  
200 Park Avenue  
New York, New York 10166  
Telephone: (212) 318-6000  
Facsimile: (212) 319-4090  
Email: jaymegoldstein@paulhastings.com

*Counsel to Sean Clements and the Conflicts Committee of  
the board of directors of DLP IV*

**Exhibit A**

**COMPENSATION BY PROFESSIONAL AND PARAPROFESSIONAL FOR FEE PERIOD**

				Total for Fee Period	
Name	Department or Group	Date of First Admission	Hourly Rate	Hours Billed	Amount
Fliman, Dan	Corporate	2003	\$1,725.00	0.50	\$862.50
Goldstein, Jayme	Corporate	2003	\$1,875.00	5.50	\$10,312.50
Grogan, James	Corporate	2000	\$1,700.00	16.00	\$27,200.00
Miller, Allison	Corporate	2004	\$1,725.00	0.80	\$1,380.00
<b>Total Partner:</b>				<b>22.80</b>	<b>\$39,755.00</b>
Evans, Jeremy	Corporate	2013	\$1,600.00	6.80	\$10,880.00
Evans, Jeremy (Travel)	Corporate	2013	\$800.00 (Bill at ½ rate)	16.30	\$13,040.00
<b>Total Counsel:</b>				<b>23.10</b>	<b>\$23,920.00</b>
Iaffaldano, Jack	Corporate	2020	\$1,125.00	3.90	\$4,387.50
Thomas, Schlea	Corporate	2022	\$855.00	6.50	\$5,557.50
<b>Total Associate:</b>				<b>10.40</b>	<b>\$9,945.00</b>
Laskowski, Mat	Paralegal		\$540.00	4.00	\$2,160.00
Magzamen, Michel	Paralegal		\$540.00	0.60	\$324.00
<b>Total Paraprofessional:</b>				<b>4.60</b>	<b>\$2,484.00</b>
<b>Total:</b>				<b>60.90</b>	<b>\$76,104.00</b>



**Exhibit B**

**COMPENSATION BY PROJECT CATEGORY FOR FEE PERIOD**

		Total for Fee Period	
U.S. Trustee Task Code and Project Category		Total Hours	Total Fees
B110	Case Administration	0.90	\$1,547.50
B113	Pleadings Review	7.40	\$8,520.00
B155	Court Hearings	17.90	\$24,235.00
B160	Employment / Fee Applications (Paul Hastings)	0.90	\$1,012.50
B195	Non-Working Travel	16.30	\$13,040.00
B260	Board of Directors Matters	2.10	\$2,995.00
B320	Plan and Disclosure Statement	15.40	\$24,754.00
<b>TOTAL</b>		<b>60.90</b>	<b>\$76,104.00</b>

**Exhibit C**

**EXPENSE SUMMARY FOR FEE PERIOD**

Category	Total for Fee Period
Airfare	\$567.80
Lodging	\$903.22
Taxi/Ground Transportation	\$451.34
Meals	\$40.00
<b>TOTAL</b>	<b>\$1,962.36</b>

**Exhibit D**

**FEE STATEMENTS FOR FEE PERIOD**



**PAUL HASTINGS LLP**  
200 Park Avenue, New York, NY 10166-3205  
t: +1.212.318.6000 | f: +1.212.319.4090 | [www.paulhastings.com](http://www.paulhastings.com)

Conflicts Committee of GWG DLP Funding IV, LLC  
Suite 1200  
220 South Sixth Street  
Minneapolis, MN 55402

August 8, 2023

Please Refer to  
Invoice Number: 2367578

Attn: Sean Clements

PH LLP Tax ID No. 95-2209675

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## SUMMARY SHEET

### **Bankruptcy Case**

PH LLP Client/Matter # 51132-00002  
Jayme Goldstein

Legal fees for professional services for the period ending June 19, 2023	\$76,104.00
Costs incurred and advanced	1,962.36
<b>Current Fees and Costs Due</b>	<b>\$78,066.36</b>
<b>Total Balance Due - Due Upon Receipt</b>	<b>\$78,066.36</b>

We encourage our clients to pay via ACH, however, in the event that you pay by check, please send payment to the remittance address below:

***TO PROTECT AGAINST FRAUD***, the Firm will not change its wiring instructions via email. We strongly encourage clients to confirm any change in wiring instructions by contacting Teri Goffredo @ 213-683-5045 or via email @ [terigoffredo@paulhastings.com](mailto:terigoffredo@paulhastings.com) and requesting written and verbal confirmation.

### **Wiring and ACH Instructions:**

Citibank  
ABA # 322271724  
SWIFT Address: CITIUS33  
787 W. 5th Street  
Los Angeles, CA 90071  
Account Number: 206628380  
Account Name: Paul Hastings LLP

### **Remittance Address:**

Paul Hastings LLP  
Lockbox 4803  
PO Box 894803  
Los Angeles, CA 90189-4803

For wires, please reference the invoice, client and matter number(s) being paid  
For ACH payments, please use the CTX format and/or send any remittances to [cashepn@paulhastings.com](mailto:cashepn@paulhastings.com). This is a no-reply mailbox  
Please refer all questions to [billing@paulhastings.com](mailto:billing@paulhastings.com)



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Suite 1200  
220 South Sixth Street  
Minneapolis, MN 55402

August 8, 2023

Please Refer to  
Invoice Number: 2367578

Attn: Sean Clements

PH LLP Tax ID No. 95-2209675

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### REMITTANCE COPY

#### **Bankruptcy Case**

PH LLP Client/Matter # 51132-00002  
Jayme Goldstein

Legal fees for professional services  
for the period ending June 19, 2023

\$76,104.00

Costs incurred and advanced

1,962.36

**Current Fees and Costs Due**

**\$78,066.36**

**Total Balance Due - Due Upon Receipt**

**\$78,066.36**

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Account Name: Paul Hastings LLP

#### **Remittance Address:**

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For ACH payments, please use the CTX format and/or send any remittances to [cashepn@paulhastings.com](mailto:cashepn@paulhastings.com). This is a no-reply mailbox

Please refer all questions to [billing@paulhastings.com](mailto:billing@paulhastings.com)



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Conflicts Committee of GWG DLP Funding IV, LLC  
Suite 1200  
220 South Sixth Street  
Minneapolis, MN 55402

August 8, 2023

Please Refer to  
Invoice Number: 2367578

Attn: Sean Clements

PH LLP Tax ID No. 95-2209675

FOR PROFESSIONAL SERVICES RENDERED  
for the period ending June 19, 2023

**Bankruptcy Case** **\$76,104.00**

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
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**B110 Case Administration**

06/05/2023	JTG4	Email with M. Laskowski re case update	0.20	1,700.00	340.00
06/07/2023	JTG4	Email with M. Laskowski re case update	0.20	1,700.00	340.00
06/08/2023	JTG4	Review and update case calendar (.2); emails with M. Laskowski about same and new pleadings (.2)	0.40	1,700.00	680.00
06/14/2023	JG32	Review case updates	0.10	1,875.00	187.50
<b>Subtotal: B110 Case Administration</b>			<b>0.90</b>		<b>1,547.50</b>

**B113 Pleadings Review**

06/01/2023	JTG4	Review recent pleadings and docket update	0.40	1,700.00	680.00
06/01/2023	ML30	Review recent filings and update case calendars and working group re same	0.60	540.00	324.00
06/02/2023	JTG4	Review recent pleadings and docket update	0.40	1,700.00	680.00
06/02/2023	ML30	Review recent filings and update working group re same	0.30	540.00	162.00
06/03/2023	JTG4	Review ECF notices	0.20	1,700.00	340.00

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2367578

Page 2

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/05/2023	JTG4	Review ECF notices	0.40	1,700.00	680.00
06/05/2023	ML30	Review recent filings and update case calendars and working group re same	0.40	540.00	216.00
06/06/2023	JTG4	Review recent pleadings, ECF notices, mediation stipulation, and related docket update	0.60	1,700.00	1,020.00
06/06/2023	ML30	Review recent filings and update working group re same	0.40	540.00	216.00
06/07/2023	JTG4	Review Beneficient objection	0.30	1,700.00	510.00
06/07/2023	ML30	Review recent filings and update working group re same	0.40	540.00	216.00
06/08/2023	JTG4	Review ECF notices and motion to sell Beneficient shares	0.50	1,700.00	850.00
06/08/2023	ML30	Review recent filings and update case calendars and working group re same	0.60	540.00	324.00
06/09/2023	JTG4	Review docket update from M. Laskowski	0.20	1,700.00	340.00
06/09/2023	ML30	Review recent filings and update working group re same	0.40	540.00	216.00
06/12/2023	JTG4	Review docket update from M. Magzamen	0.20	1,700.00	340.00
06/12/2023	MM57	Review recent docket/ECF filings and update calendars and working group re: same	0.10	540.00	54.00
06/13/2023	JTG4	Review docket update from M. Magzamen (.2); review ECF notices (.5)	0.70	1,700.00	1,190.00
06/13/2023	MM57	Review recent docket/ECF filings and update calendars and working group re: same	0.10	540.00	54.00
06/14/2023	MM57	Review recent docket/ECF filings and update calendars and working group re: same	0.10	540.00	54.00
06/15/2023	MM57	Review recent filings and update calendars and working group re: same	0.10	540.00	54.00
<b>Subtotal: B113 Pleadings Review</b>			<b>7.40</b>		<b>8,520.00</b>

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2367578

Page 3

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>B155 Court Hearings</b>					
06/02/2023	JTG4	Call with S. Thomas regarding upcoming hearing	0.20	1,700.00	340.00
06/02/2023	SMT1	Telephone conference with J. Grogan regarding hearing on 6/5/23	0.20	855.00	171.00
06/12/2023	JTG4	Review agenda for June 13 hearing and prepare notes for same	0.60	1,700.00	1,020.00
06/13/2023	J12	Attend hearing on motion to allow claims for voting purposes and motion to sell Beneficient shares	0.40	1,125.00	450.00
06/13/2023	JTG4	Correspond with S. Thomas and J. Evans regarding June 15, 2023 hearing (.3); review submissions in preparation for same (.9); attend hearing on motion to allow claims for voting purposes and motion to sell Beneficient shares (.4)	1.60	1,700.00	2,720.00
06/13/2023	SMT1	Correspond with J. Grogan and J. Evans regarding confirmation hearing (.2); attend hearing regarding motion to allow claims for voting purposes and motion to sell Beneficient shares following de-SPAC transactions (.4)	0.60	855.00	513.00
06/15/2023	J12	Attend plan confirmation hearing	1.60	1,125.00	1,800.00
06/15/2023	JTG4	Review additional confirmation pleadings and proposed order to prepare for confirmation hearing (3.1); attend confirmation hearing (1.6); correspond with J. Evans and S. Thomas regarding hearing prep and case updates (.6)	5.30	1,700.00	9,010.00
06/15/2023	JDE	Review submissions and supplement hearing notes for plan confirmation hearing (.9); attend plan confirmation hearing (1.6)	2.50	1,600.00	4,000.00
06/15/2023	MM57	Submit electronic appearances for hearing	0.20	540.00	108.00
06/15/2023	SMT1	Review submissions and cases in preparation for confirmation hearing (1.7); prepare reference documents for confirmation hearing (1.3); attend plan confirmation hearing (1.6)	4.60	855.00	3,933.00



Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2367578

Page 4

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/19/2023	JTG4	Review W&E list from Beneficent	0.10	1,700.00	170.00
<b>Subtotal: B155 Court Hearings</b>			<b>17.90</b>		<b>24,235.00</b>

**B160 Fee/Employment Applications**

06/09/2023	JI2	Draft April fee statement (.2); draft interim fee application (.7)	0.90	1,125.00	1,012.50
<b>Subtotal: B160 Fee/Employment Applications</b>			<b>0.90</b>		<b>1,012.50</b>

**B195 Non-Working Travel**

06/14/2023	JDE	Travel from New York, NY to Houston, TX for confirmation hearing. (Bill at 1/2 rate)	10.50	800.00	8,400.00
06/16/2023	JDE	Travel from Houston, TX to New York, NY from confirmation hearing. (Bill at 1/2 rate)	5.80	800.00	4,640.00
<b>Subtotal: B195 Non-Working Travel</b>			<b>16.30</b>		<b>13,040.00</b>

**B260 Board of Directors Matters**

06/03/2023	JI2	Prepare director invoice (.3); emails with S. Clements re same (.1); emails with L. Chiappetta (Mayer Brown) re same (.1)	0.50	1,125.00	562.50
06/14/2023	JI2	Attend board meeting with J. Evans (.4); emails with D. Fliman and J. Evans re same (.1)	0.50	1,125.00	562.50
06/14/2023	JG32	Correspond with J. Evans and client regarding case plan and next steps	0.40	1,875.00	750.00
06/14/2023	JDE	Review plan issues and prepare outline for board meeting (.3); attend board meeting with J. Iaffaldano (.4)	0.70	1,600.00	1,120.00
<b>Subtotal: B260 Board of Directors Matters</b>			<b>2.10</b>		<b>2,995.00</b>

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2367578

Page 5

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>B320 Plan and Disclosure Statement (including Business Plan)</b>					
06/05/2023	JTG4	Review and analyze plan objections	0.70	1,700.00	1,190.00
06/05/2023	JDE	Review and analyze plan, disclosure statement, and supporting documents	1.50	1,600.00	2,400.00
06/05/2023	ML30	Correspond with J. Iaffaldano re plan objections and responses (.2); research regarding same (.6); follow up correspondence with J. Iaffaldano regarding same (.1)	0.90	540.00	486.00
06/08/2023	DF9	Correspond with J. Evans re plan provisions and exculpations.	0.50	1,725.00	862.50
06/09/2023	JTG4	Review updated plan documents and new plan objections	0.80	1,700.00	1,360.00
06/09/2023	JDE	Review and analyze plan modifications.	0.80	1,600.00	1,280.00
06/12/2023	AM50	Review recent case updates regarding Plan releases for independent directors	0.30	1,725.00	517.50
06/13/2023	JDE	Review recent docket filings in anticipation of confirmation hearing.	0.50	1,600.00	800.00
06/14/2023	AM50	Follow up correspondence with J. Evans regarding certain plan provisions	0.50	1,725.00	862.50
06/14/2023	JTG4	Emails with S. Thomas and J. Evans re June 15 confirmation hearing (.6); prepare for same by reviewing amended plan and related confirmation documents (1.4)	2.00	1,700.00	3,400.00
06/14/2023	JG32	Analyze submissions and issues regarding plan confirmation and hearing	1.70	1,875.00	3,187.50
06/14/2023	JG32	Review certain recently filed pleadings regarding confirmation	0.70	1,875.00	1,312.50
06/14/2023	JDE	Analyze plan comments	0.80	1,600.00	1,280.00
06/14/2023	SMT1	Review submissions in preparation for confirmation hearing on 6/15/23	1.10	855.00	940.50

Conflicts Committee of GWG DLP Funding IV, LLC  
51132-00002  
Invoice No. 2367578

Page 6

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/15/2023	JG32	Analyze and comment on plan confirmation matters (1.4); telephone conference with client regarding same (.4); review submissions related to plan confirmation and hearing (.8)	2.60	1,875.00	4,875.00
<b>Subtotal: B320 Plan and Disclosure Statement (including Business Plan)</b>			<b>15.40</b>		<b>24,754.00</b>
<b>Total</b>			<b>60.90</b>		<b>76,104.00</b>

**Timekeeper Summary**

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
JG32	Jayne Goldstein	Partner	5.50	1,875.00	10,312.50
AM50	Allison Miller	Partner	0.80	1,725.00	1,380.00
DF9	Dan Fliman	Partner	0.50	1,725.00	862.50
JTG4	James T. Grogan	Partner	16.00	1,700.00	27,200.00
JDE	Jeremy D. Evans	Of Counsel	6.80	1,600.00	10,880.00
JDE	Jeremy D. Evans	Of Counsel	16.30	800.00	13,040.00
JI2	Jack Iaffaldano	Associate	3.90	1,125.00	4,387.50
SMT1	Schlea M. Thomas	Associate	6.50	855.00	5,557.50
ML30	Mat Laskowski	Paralegal	4.00	540.00	2,160.00
MM57	Michael Magzamen	Paralegal	0.60	540.00	324.00

**Costs incurred and advanced**

<u>Date</u>	<u>Description</u>	<u>Quantity</u>	<u>Rate</u>	<u>Amount</u>
06/28/2023	Airfare - Jeremy Evans; 06/14/2023; From/To: LGA/IAH; Airfare Class: Economy; trip to Houston, Texas regarding attending Confirmation hearing			567.80

Conflicts Committee of GWG DLP Funding IV, LLC  
 51132-00002  
 Invoice No. 2367578

Page 7

06/28/2023	Travel Expense - Meals - Jeremy Evans; 06/15/2023; Restaurant: Morton's ; City: Houston ; Dinner; Number of people: 1; trip to Houston, Texas regarding attending Confirmation hearing	40.00
06/28/2023	Lodging - Jeremy Evans; 06/16/2023; Hotel: Marriott; Check-in date: City: Houston; 06/14/2023; Check-out date: 06/16/2023; trip to Houston, Texas regarding attending Confirmation hearing	903.22
06/28/2023	Taxi/Ground Transportation - Jeremy Evans; 06/16/2023; From/To: Airport/Home ; Service Type: Uber; Time: 11:30; trip to Houston, Texas regarding attending Confirmation hearing	102.74
06/28/2023	Taxi/Ground Transportation - Jeremy Evans; 06/16/2023; From/To: Hotel/Airport ; Service Type: Uber; Time: 05:28; trip to Houston, Texas regarding attending Confirmation hearing	117.57
06/28/2023	Taxi/Ground Transportation - Jeremy Evans; 06/15/2023; From/To: Airport/Hotel ; Service Type: Uber; Time: 01:24; trip to Houston, Texas regarding attending Confirmation hearing	145.73
06/28/2023	Taxi/Ground Transportation - Jeremy Evans; 06/14/2023; From/To: Home/Airport ; Service Type: Uber; Time: 17:15; trip to Houston, Texas regarding attending Confirmation hearing	85.30
<b>Total Costs incurred and advanced</b>		<b>\$1,962.36</b>
<b>Current Fees and Costs</b>		<b>\$78,066.36</b>
<b>Total Balance Due - Due Upon Receipt</b>		<b>\$78,066.36</b>

**EXHIBIT C**

**PROPOSED ORDER**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

GWG Holdings, Inc., *et al.*,<sup>1</sup>

Debtors.

) Chapter 11

) Case No. 22-90032 (MI)

) (Jointly Administered)

**FINAL ORDER ALLOWING COMPENSATION  
AND REIMBURSEMENT OF EXPENSES  
(Docket No. \_\_\_\_)**

The Court has considered the *Third Interim and Final Fee Application of Paul Hastings LLP, Counsel to Sean Clements and the Conflicts Committee of the Board of Directors of GWG DLP Funding IV, LLC, for Allowance and Payment of Fees and Expenses for the Period from May 1, 2023 Through June 19, 2023* (the “Application”) filed by Paul Hastings LLP (the “Applicant”).

The Court orders:

1. Applicant is allowed compensation and reimbursement of expenses in the amount of \$151,043.20 for the interim period set forth in the Application.
2. The compensation and reimbursement of expenses allowed in this Order and all previous interim allowances of compensation and reimbursement of expenses are approved on a final basis.

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: GWG Holdings, Inc. (2607); GWG Life, LLC (6955); GWG Life USA, LLC (5538), GWG DLP Funding IV, LLC (2589); GWG DLP Funding VI, LLC (6955); and GWG DLP Funding Holdings VI, LLC (6955). The location of Debtor GWG Holdings, Inc.’s principal place of business and the Debtors’ service address is 325 N. St. Paul Street, Suite 2650 Dallas, TX 75201. Further information regarding the Debtors and these chapter 11 cases is available at the website of the Debtors’ claims and noticing agent: <https://donlinrecano.com/gwg>.

3. The Debtors are authorized to disburse any unpaid amounts allowed by paragraphs 1 or 2 of this Order.

Dated: \_\_\_\_\_, 2023  
Houston, Texas

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THE HONORABLE MARVIN ISGUR  
UNITED STATES BANKRUPTCY JUDGE